

APR 0 3 2018

March 29, 2018

Norristan, PA 19401 2 East Main Street Southeast Regional Office Department of Environmental Protection Regional Air Quality Program Manager James Rebarchak

Title V Annual Compliance Certification Re:

TVOP 23-00012; Report Period: 1/1/2017 - 12/31/2017 Braskem America, Inc. - Marcus Hook

Dear Mr. Rebarchak:

report is required by our Title V Permit, Section B, Condition #024. Braskem America, Inc. hereby submits the above-referenced report. This attached

the Clean Air Act, 40 CFR Part 68, and 25 Pa Code §127.512(i). hereby states that this facility is in compliance with the requirements of Section 112(r) of As required by our Title V Permit, Section B, Condition #026, Braskem America, Inc.

Please note the following contacts at the facility for Title V:

Responsible Official

Facility Manager Conway Yee

8028-794 (019)

Environmental Engineer Jeffrey Hirt

Permit Contact Person

:<u>əlfiT</u> Name:

(610) 497-8229

Suoud:

Engineer, Jeffrey Hirt, at the above number or by e-mail at jeffrey.hirt@braskem.com. If you have any questions, please do not hesitate to contact our Environmental

BRASKEM AMERICA, INC. Sincerely,

Facility Manager Сопиау Үее

U. S. Environmental Protection Agency, Region III Air Enforcement Branch (3AP12) :00

1650 Arch Street

Philadelphia, PA 19103-2029







PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR QUALITY COMPLIANCE CERTIFICATION FORM

(25 Pa. Code § 127.513)

Plant Name:	BRASKEM AMER INC/MARCUS HOOK	Owner/Operator:	BRASKEM AMER INC
Tax ID/Plant:	25-1534498-1	DEP Facility ID:	515469
Contact Person:	JEFFREY HIRT	Title:	ENVIRONMENTAL ENGINEER
Opposition Double #	22 00022		
Operating Permit #:	23-00012	Phone Number:	(610) 497-8229

23-00012, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances and excursions: For the period 01/01/2017 - 12/31/2017, BRASKEM AMER INC/MARCUS HOOK has been in continuous compliance with all applicable requirements of permit #

sect./cond.#	Citation #	Source	Noncompliance	Monitoring Method(s)	Date	Duration	Corrective Action(s)
B / 008	(a)	General Require- ment	Permittee did not comply with all conditions of this permit.	Company policy and our knowledge, information and belief formed after a reasonable inquiry, except as otherwise set forth in this certificate of compliance.	See below Deviations	See below Deviations	See below Corrective Actions
D(106)	(#001)(a)	106	According to	Periodic sampling results and	9/1/2017	9/1/2017	The cause was to be at the
D(107)	(#001)	107	Sunoco Logistics, the sample result	automated control systems to adjust flare BTU content		7/1/201/	nitrogen in the sweep gas. The
D(107)	(#002)(a)	107	of the flare gas was less than 300				flow of nitrogen to the flare.
			BTU/scf on one				

	compliance review period			
	conditions during the	(1) Enlorcement action		1508
	with all permit terms and			
	units described in this			Requirements)
	identified below, emission	one (1) or more of the following:		(.Compliance
⊠Intermittent	those terms and conditions	Clean Air Act and the Air Pollution Control Act and is grounds for		127.512(6)(1)]
Continuous	the possible exception of	Noncompliance with this permit constitutes a violation of the		127.25, 127.444, &
		(a) The permittee shall comply with the conditions of the	Section B	[25 Pa. Code §§
	amenable to certification			
	obligations and is thus not			
	(c) StateMent of law that			
	(a) Otatament of least			
	in this reporting period.			
	authorized representatives			
	entrance to PADEP or its			
	facility never denied	(1) Linei at leasollable liftles upon		
	information and belief the	(1) Enter of recognish times are		
	lipon knowledge			Eilly)
	to enter the facility Rased			(Inspection and
	allow FADER allo its	perform the following:		:
	allow BADER and its	Protection or authorized representatives of the Department to		the CAA]
Intermittent	plant entrance during	permittee shall allow the Department of Environmental		4008 and § 114 of
⊠Continuous	A guard is on duty at the	may be required by law for inspection and other documents as	Section b	127.513, 35 P.S. §
80	the renewal application.			DA Da Codo S
	lees were subflitted with			
	fees were submitted with			
	applicable information and	Storial All Ivid		(Permit Renewal)
	admillistratively complete	submitted to the Department's Regional Air Ma		
	odministrative and deemed	The renewal application is timely if a complete application is		& 127.503]
Intermittent	was submitted to PADEP	more than 18 months before the expiration date of this permit		127.414, 127.446(e)
Continuous	ine reliewer application	submitted to the Department at least six (6) months, and not		127.412, 127.413,
	The ropous opplication	(a) An application for the renewal of the Title V permit shall be	Section B	[25 Pa. Code §§
Conditions was:				
with Terms &	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	- GIIIII	
		Terme & Conditions Contained	Permit	Citation

titutes Ith this With the Potion of the Intified below, Ith all permit Ith all permit Ith all required Ith a	explanatory statement that imposes no compliance obligations and is thus not operation.			
titutes Ith this With the With the ption of the ntified below, described were in ith all permit nditions in er the y all required onitoring in (c) is an tatement that compliance nd is thus not	explanatory st imposes no co obligations an			
titutes Ith this With the With the ption of the ntified below, sidescribed were in ith all permit nditions in er the as y all required onitoring in (c) is an tatement that ompliance	explanatory st imposes no co			
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titutes Ith this With the ption of the ntified below, sidescribed were in ith all permit nditions in er the r, as y all required onitoring in	the permit.		OMAI I	
titutes Ith this With the With the ption of the ntified below, secribed were in ith all permit nditions in er the as y all required	testing and monitoring in			
titutes ith this With the With the ption of the ntified below, s described were in ith all permit nditions in er the	determined by all required			
titutes Ith this With the ption of the ntified below, s described were in ith all permit nditions in er the	previous year, as			15
titutes ith this With the ption of the ntified below, s described were in ith all permit nditions in	this permit over the			
titutes ith this With the Potion of the Intified below, Ith described Were in Were in Were in	terms and conditions in			
titutes ith this With the ption of the ntified below, s described were in	compliance with all permit			
titutes ith this With the ption of the ntified below, s described	in this permit were in			Manager Manage
titutes ith this With the ption of the ntified below,	emission units described			
titutes ith this With the ption of the	deviations identified below,			
titutes ith this With the	possible exception of the			
titutes ith this	requirement. With the			
titutes	compliance with this			
i con i de i i de	V permit constitutes			
THE THE	incorporated into the Title			
ato the Title	practice standards			
ords .	operating and work			
Work	operating and			
th the	compliance with the			
umes that	Braskem presumes that			
nce of (b):	Second sentence of (b):			
	alliciatio to o			72
artification	amenable to certification			
d is thus not	obligations and is thus not			
mpliance	imposes no compliance			
aw that	Statement of law that			
nce of (a):	Second sentence of (a):			
00111111	monitoring in the beninc	(2) Fellilli tellillilation, revocation		
o comit	reduired results and	(2) Dormit termination revocation		S IST Temporaries
a pool	required testing			
hy the	as determined by the			
Conditions was:				
	Compliance Status	in the Permit	Section	
Compilation	Mealls of Determining	lerms & Conditions Contained	Permit	Citation

Certification of Continuous or Intermittent Compliance 23-00012 - BRASKEM AMER INC/MARCUS HOOK

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	Applicable annual Title V			
⊠Continuous □Intermittent	Permit fees were paid according the invoice provided by the Department.	(a) The permittee shall pay tees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).		127.704, 127.705 & 127.707] (Fee Payment)
			Specifica B	[25 Pa Code SS
	amenable to certification.	significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA		Operating Permit
□Intermittent	obligations and is thus not	amendments, the permittee shall submit an application for		(Significant
⊠Continuous	Statement of law that	When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative	Section B	[25 Pa. Code § 127.541]
	within a reasonable time.	(b) Upon request, the p		
	copies of records			
	Facility has supplied	determine compliance with the permit.		Information)
	reasonable time.	revoking and reissuing, or terminating the permit, or to		(Duty to Provide
□Intermittent	PADEP within a	writing to determine whether cause exists for modifying,		127.512(c)(5)]
⊠Continuous	Facility has supplied all	(a) The permittee shall furnish to the Department, within a	Section B	127.411(d) &
	ceruncation is required.			
	permit. Therefore, no			
20	requirements of the Title V			
	with the applicable			
	essential for compliance			39
	permits which are			eri Ca
	approvals/ installation			
	applications for plan			
	design details in			
	physical configurations or			
	determination of the			
	PADEP made a			
Conditions was:				
with Terms &	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	remin	Clianon
rage 3			Citation Down it	Citation

	There were no minor sources installed or deminimis increases of the mentioned minor sources			Minimis Emission Increases)
	Change procedure.	issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written n		(Authorization for De
□Intermittent	facility's Management of	new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior		127.14(b) & 127.449]
⊠Continuous	Plant changes are	(a) This permit authorizes de minimis emission increases from a	Section B	[25 Pa. Code §§
	(f) Statements of law that impose no compliance obligations and are thus not amenable to certification.			
	(e) Statements of law that impose no compliance obligations and are thus not amenable to certification.		9	45
į	(d) Statements of law that impose no compliance obligations and are thus not amenable to certification.			
	not amenable to certification.			
	(c) Statements of law that impose no compliance obligations and are thus	lot of capit forth but appropriate and appropr		
	permit fees were paid by September 1 for the previous calendar year.	(b) Emission Fees. The permittee shall, on or before September		
with Terms & Conditions was:	Compliance Status	in the Permit	Section	s S
Compliance	Means of Determining	Terms & Conditions Contained	Permit	Citation Permit

Citation				C
Citation	remme	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
			during this compliance review period.	
			(f) Statements of law that impose no compliance obligations and are thus not amenable to certification.	
[25.Pa. Code §§ 127.11a & 127.215]	Section B	(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but	There were no sources which were reactivated	⊠Continuous .
(Reactivation of Sources)		less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will	during this compliance review period.	□Intermittent
[25 Pa. Code §§ 121.9 & 127.216] (Circumvention)	Section B	(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a	The facility did not engage in any activity which may have been construed as	⊠Continuous ☐Intermittent
	ı	staging, delaying or engaging in incremental construction,	circumvention of applicable permit or regulatory requirements.	E.
			The facility did not use a device, stack height which exceeds good engineering practice stack height, dispersion technique or	16
			other technique which would conceal or dilute an emission of air	224
9			contaminants which would otherwise be in violation of	Waterier as
			this permit, the Air Pollution Control Act or the regulations promulgated	2
		V.	unere under during this	

	Monitoring, analysis, testing, and sampling procedures specified by this permit were conducted in accordance with the requirements of 25 Pa Code Chapter 139 or by the Clean Air Act, as			
⊠Continuous □ Intermittent	Monitoring, analysis, testing, and sampling procedures specified by this permit were performed as needed. There were no additional applicable requirements promulgated under the Clean Air Act after permit issuance.	(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable req	Section B	[25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA] (Sampling, Testing and Monitoring Procedures)
		(b) Any report		ja v
	All applications, forms, reports or compliance certifications submitted contained the required certification statement by the responsible official.	Regional Air Program Manager PA Department of Environmental Protection (At the address given on the permit transmittal letter, or otherwise notified)		
⊠Continuous ☐Intermittent	All required submissions were submitted to the appropriate address of either PADEP or EPA.	(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:	Section B	[25 Pa. Code §§ 127.402(d) & 127.513(1)] (Submissions)
	compliance review period.			
with Terms & Conditions was:	Compliance Status	in the Permit	Section	Citation
Compliance	Means of Determining	Terms & Conditions Contained	R INC/MARCUS HOOK	23-00012 - BRASKEM AMER INC/MARCUS HOOK

	Reporting requirements specified by this permit were performed, as needed, and contained the required certification statement by the responsible official.			
Intermittent	specified by this permit. Moreover, there were no additional applicable requirements promulgated under the Clean Air Act after permit issuance.	requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean A		(Reporting Requirements)
⊠Continuous	Facility has fulfilled all reporting requirements	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit.	Section B	127.411(d), 127.442,
55.5 (1/20) 200 (1/20)	emission statement requirements in 25 Pa. Code Chapter 135.	(···	×	
	all records required to comply with reporting, recordkeeping and	(2) The dates the analyses were performed.		
- S	Facility has maintained and made available, upon request of the Department,	(1) The date, place (as defined in the permit) and time of sampling or measurements.		
	all records of required monitoring information.			(Recordkeeping Requirements)
⊠Continuous □Intermittent	Facility has maintained and made available, upon request of the Department	(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:	Section B	127.511 & Chapter 135]
	needed.		:	
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	lerms & Conditions Contained	Costion	Ta Ta Citation
		H	Dormit	Citation

6	(f) This is a historical			
*	(e) Facility has maintained records supporting implementation of accidental release program for the past five (5) years.			
Q	Facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).			
	(d) In the cover letter for the facility's Annual Certification Report, the following statement was included:			e-
	(c) Statement of law that imposes no compliance obligations and is thus not amenable to certification.			Classification and
	(b) This is a historical requirement and imposes no specific requirements during the current period.			
	before June 21, 1999. The facility has submitted all necessary updates, corrections, and resubmittals as required.			
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	Permit	Citation

23-00012 - BRASKEM AME	23-00012 - BRASKEM AMER INC/MARCUS HOOK		Moons of Determining	Compliance
Citation	Section	in the Permit	Compliance Status	with Terms &
			requirement and imposes	
			during the current	
			compliance review period.	
			Facility has registered and submitted RMP.	
D Code	opposition C -		Braskem has designed	⊠Continuous
§121.7]	Restrictions -	the second secon	and implemented policies	Intermittent
(Prohibition of air	Restriction(s)	Air Pollution Control Act (35 P.S. § 4003).	incident reporting that are	
pollution.)			consistent with permit requirements.	¥
125 Pa Code	Section C - I.		Braskem has designed	⊠Continuous
§123.1]	Restrictions - Emission	Except as permitted herein, no person may permit the emission	and implemented policies and procedures for	□Intermittent
(Prohibition of	Restriction(s)	into the outdoor atmosphere	incident reporting that are	
certain fugitive emissions)		of a fugitive air contaminant from a source other than the	requirements.	2
		tollowing:	8 8	ï
		(a) Construction or demolition of buildings or structures.		
*0		(b) Grading, paving and maintenance of roads and streets.		1 24
10				
2004		(c) Use of roads a		
[25 Pa. Code	Section C - I.		To control the emissions of	⊠Continuous
§123.2]	Restrictions - Emission	No person may permit fugitive particulate matter to be emitted	the facility has work	□Intermittent
(Fugitive particulate	Restriction(s)	into the outdoor atmosphere from a source specified in Section	practices in place, in	

§123.31] Restrictions - Emission (Limitations) Restriction(s)		Section	Citation Permit
A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.	C, Condition # 002 if the emissions are visible at the point the emissions pass outside the person's property.	in the Permit	Terms & Conditions Contained
To prevent the detection of malodors outside of the property, the facility has work practices in place, in accordance with applicable regulatory requirements and as specified by individual permit terms and conditions below. These practices include a process for review and	accordance with applicable regulatory requirements for PM and as specified by individual Permit terms and conditions below. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event reporting process. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices.	Compliance Status	Means of Determining
⊠Continuous □ Intermittent		with Terms & Conditions was:	Compliance

23-00012 - BRASKEM AM Citation	23-00012 - BRASKEM AMER INC/MARCUS HOOK Citation Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
			and visible emission	- 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
· ·			inspections", the facility's	9
			total event reporting	
			process, and the	
			hydrocarbon Leak	
			Detection and Repair	
			program. Compliance	
59			review for this term	
*6			consisted of a review by	
			Braskem America, Inc.	
28.L			staff of the reports and	
			records associated with	
			these work practices.	
DE DO COMO	Spotion C -		Performed weekly	⊠Continuous
[20 - a. Couc	Restrictions -		observations (modified	
8120.41	Emission	A person may not permit the emission into the outdoor	Method 22) using "Odor	Intermittent
(Limitations)	Restriction(s)	atmosphere of visible air contaminants in such a manner that	and Fugitive Emissions"	
		the opacity of the emission is either of the following:	inspection form submitted	
			o allo Dobal allione los	
			review/approvation	*
72		(a) Equal to or greater than 20% for a period or periods	at the flare an automated	
		aggregating more than three (3) minutes in any one (1) hour.	system is in place to	3
			measure the propensity of	TO THE
			the flame to smoke and	
		(b) Equ	add steam to mitigate	
0.00			smoking.	
195 Pa Code	Section C - I		Statements of law that	⊠Continuous
§123.42]	Restrictions -	The emission limitations of 25 Da Code & 123 41 shall not apply	impose no compliance	□Intermittent
	Dootsiotion(o)		not amenable to	
(Exceptions)	Restriction(s)		The state of the s	

Citation	Permit	Torme & Conditions Contained		
		i eilis & conditions contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
* 666 2		(a) The presence of uncombined water is the only reason for failure of the emission to meet the limitations;		
		(b) The emission results from the operation of equipment used solely to train and test persons in observing the opaci		
[25 Pa. Code §129.14] (Open burning	Section C - I. Restrictions - Emission Restriction(s)	No person may permit the open burning of material in an air basin, except where the open burning operations result from:	Braskem did not conduct any of the listed fire exercises that required specific Department	⊠Continuous ☐Intermittent
obeignoral		(1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.	approval.	
		(2) A fire set for the purpose of inst		
[25]Pa. Code §127.441]	Section C - II. Testing Requirements	(a) The Department reserves the right to require expense the limits of the linitial limits of the limits of the limits of the limits of the li	Statements of law that impose no compliance	⊠Continuous
(Operating permit terms and conditions.)		testing of any source(s) as necessary to verify emissions for purposes including determining the correct emission fee, malfunctions, or determining compliance with any applicable requirement.	obligations and are thus not amenable to certification.	□Intermittent
1 8 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2	(b) If at any time the Department has cause		
[25 Pa. Code §123.43]	Section C - III. Monitoring Requirements	Visible emissions may be measured using either of the	This is a historical requirement which	⊠Continuous
techniques)		ionownig.	during performance testing. When the facility	

Citation	Citation Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
			measures visible emissions, such as during	
		(a) A device approved by the Department and maintained to provide accurate opacity measurements.	performance testing, a trained observer is used.	20° E
			Additionally, no	8
			quantitative	ii.
	£5	(h) Observers trained and qualified, to measure plume opacity	measurements were	1
		with the naked eye or with the aid of any devices approved by	required during this	
		the Dep	thus this requirement is	
•	-		not amenable to	
3			certification during this	
			compliance review period.	
75 Pa Code	Section C - III.	(a) The permittee shall monitor the facility, once per operating	To prevent the detection of	⊠Continuous
§127.441]	Monitoring	day, for the following:	malodors outside of the	□Intermittent
(Operating permit	-		work practices in place, in	
terms and		(1) Odors which may be objectionable (as per 25 Pa. Code	accordance with applicable regulatory	
		§123.31).	requirements and as	
		(2) Visible Emissions (as per 25 Pa. Code 88123.41 and	specified by individual	
			permit terms and	
30	10		conditions below. Tilese	2
		(3) Fugitive Particulate Matter (as per 25 Fa. Code 98 125.1	process for review and	
		מוע ובט.ב).	correction of deviations	
			reported via routine "odor	
			and visible emission	
		(inspections", the facility's	
			total event reporting	
3			process, and the	
			hydrocarbon Leak	
			Detection and Repair	
			program, Compliance	

	and visible enlission			
⊠Continuous □Intermittent	Facility has work practices and procedures in place in accordance with applicable regulatory requirements and as specified by individual terms and conditions of this Permit. These practices include a process for review and correction of deviations reported via routine "odor and visible emission"	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.] (a) The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviati	Recordkeeping Requirements	§127.441] (Operating permit terms and conditions.)
	review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices. In the event odors or emissions are detected outside the facility, facility has work practices to report, investigate & mitigate the incident. A permanent log of the "odor and visible emission inspections" forms are kept onsite. (c) Statement of law that imposes no compliance obligations and is thus not amenable to certification.			
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	Permit	Citation

	accordance with applicable regulatory	matter from becoming airborne. These actions shall include, but not be limited to, the following:		(Prohibition of certain fugitive emissions)
☐Intermittent	fugitive air contaminants, the facility has work	For any source specified in Condition #002 of this Section, the	Section C - VI. Work Practice Standards	[25 Pa. Code §123.1]
	(b) Statement of law that imposes no compliance obligations and is thus not amenable to certification.	report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same		d
⊠Continuous ☐Intermittent	Reports were submitted to the Department by March	(a) The owner or operator shall submit, by March 1 of each year, a source report for the preceding calendar year. The	Section C - V. Reporting Requirements	[25 Pa. Code §135.3] (Reporting)
	notification guidelines.	(1) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year		
	Applicable events as described in (b) and (c) were communicated to the Department in accordance	(a) The permittee shall submit the following reports:		(Operating permit terms and conditions.)
⊠Continuous ☐Intermittent	This certification report is intended to satisfy this requirement.	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c).]	Section C - V. Reporting Requirements	[25 Pa. Code §127.441]
	Facility submitted the necessary record formats to the Department for approval on 4/16/2009.			
	inspections" and the facility's total event reporting process.			
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	Citation Permit	Citation

	0.04 grains per dry standard cubic foot.			(Incinerators)
	permit application, the particulate matter emissions do not exceed	dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.	Ş	[25 Pa. Code §123.12]
⊠Continuous ☐Intermittent	Based on emissions calculations using the design specifications in the	No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per	Section D - I. Restrictions - Emission Restriction(s)	THREE STORAGE SILOS
100 400 400 400 47 400 400 400 400 400 40	action to implement measures to reduce emissions.	cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) indentified in Section A, of th		conditions.)
⊠Continuous ☐Intermittent	Facility does not have any identified sources where there was a required	(a) The permittee shall begin to immediately implement measures, which may include for the installation of an oil	Practice Standards	§127.441] (Operating permit
	these work practices.			35.00
181	records associated with			
	by Braskem America, Inc.			
	term consisted of a review			58
	reporting process. Compliance review for this		造	
	facility's total event			
	inspections" and the			
	and visible emission			
5 Miles	correction of deviations			3.
+1)	process for review and			
8 22 50	practices include a			3-0
	this permit. These	ā		
	terms and conditions of	(a) Use, where possible, of water or chemicals for control of dust		
	requirements for PM and as specified by individual			
Conditions was:				
with Terms &	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	, di	
- aga		H	n Permit	Citation

Certification of Continuous	Certification of Continuous of Intermittent Compilative	ď		
Citation	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
101A - PLANT 1, THREE STORAGE SILOS	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority of this permit condition is also derived from 25 Pa. Code §127.511.]	VOC emissions for the 101A silos are calculated monthly using approved emission calculation	⊠Continuous □Intermittent
[25 Pa. Code §129.99]		The total volatile organic compounds (VOC) emissions from the silos under this source identification shall not exceed 12.10 tons on a 12-month rolling sum.	methodologies. A 12- month rolling sum is determined and compared	
(Alternative RACT proposal and petition for alternative compliance schedule.)		on a 12-month rolling sum.	against the 12.10 ton per 12 month rolling sum emission limit.	
101A - PLANT 1, THREE STORAGE SILOS	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]	Production and silo hours are tracked monthly; a 12-month rolling sum production rate is	⊠Continuous ☐Intermittent
[25 Pa. Code §129.100]	8	The permittee shall monitor and record the polypropylene production and silos operation hours on a monthly basis.	calculated and compared to the production limit.	60 10
(Compliance demonstration and recordkeeping requirements.)				
101A - PLANT 1, THREE STORAGE SILOS	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]	Production and silo hours are tracked monthly; a 12-month rolling sum	⊠Continuous ☐Intermittent
[25 Pa. Code §129.100]		The permittee shall keep records of	calculated and compared to the production limit.	
(Compliance demonstration and recordkeeping requirements.)		(a) Polypropylene production on a monthly basis, and 12-month rolling sum;	VOC emissions calculated using November 2011 Plant 2 storage silos stack test results.	

Certification of Continuous or Intermittent Compliance 23-00012 - BRASKEM AMER INC/MARCUS HOOK

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23-00012 - BRASKEW AMER INCIMARCUS HOOK	ER INC/MARCUS HOOK			Page 19
Citation	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
20 AF 12 AF		(b) Silos operation hours each month;		
		(c) VOC emissions from the silos on a monthly basis		
101A - PLANT 1, THREE STORAGE SILOS	Section D - VII. Additional Requirements	The silos are not subject to the provisions of 40 CFR 60 Subpart DDD, as per the definition of 'commenced' in 40 CFR §60.2, and the applicability specified in 40 CFR §60.560(b)(1)(ii).	Statement of law not amenable to certification.	⊠Continuous ☐Intermittent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.560]				
(Applicability and designation of affected facilities.)			9	
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code	Section D - I. Restrictions - Emission Restriction(s)	No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot, when the effluent gas volume is less than 150.000 dry standard cubic feet per minute.	Based on emissions calculations using the design specifications in the permit application, the	⊠Continuous □Intermittent
(Processes)			emissions do not exceed 0.04 grains per dry standard cubic foot.	
101B - PLANT 2, THREE STORAGE SILOS	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority of this permit condition is also derived from 25 Pa. Code §127.512.]	VOC emissions for the 101B silos are calculated monthly using approved	⊠Continuous ☐Intermittent
[25 Pa. Code		VOC emissions from the silos under this source identification	emission calculation methodologies. A 12-	

	are tracked monthly; a 12-	[Additional authority for this perfilit cordinoll is also delived from	Recordkeeping	THREE STORAGE
X Continuous	Dod not silo hours			demonstration and recordkeeping requirements.)
e e	calculated and compared to the production limit.	The permittee shall monitor and record the polypropylene production and silos operation hours on a monthly basis.		[25 Pa. Code §129.100]
⊠Continuous ☐Intermittent	Production and silo hours are tracked monthly; a 12-month rolling sum production rate is	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]	Section D - III. Monitoring Requirements	101B - PLANT 2, THREE STORAGE SILOS
				(Applicability and designation of affected facilities.)
£				New Stationary Sources §40 CFR 60.560]
A s	requirement.	as per 40 CFN Soc.obo(g).		[40 CFR Part 60 Standards of
□Intermittent	conducted on 11/22/2011 of source 101B which demonstrates this	eight percent total organ silos shall be less than 0	Restrictions - Emission Restriction(s)	THREE STORAGE SILOS
⊠Continuous	A representative test was	To and a fact his part has part has part has part has part has been a fact his part has been a f		i
	rolling sum emission limit.			for alternative compliance
	against the 1.06 lb/hr and 4.64 ton per 12 month			(Alternative RACT
	month rolling sum is determined and compared	shall not exceed 1.06 pounds per hour and 4.64 tons per year		§129.99]
Conditions was:	compliance status	in the Permit	Section	
Compilance	Weans of Determining	Terms &	Permit	Citation
Compliance	Moon of Determining		R INC/MARCUS HOOK	23-00012 - BRASKEM AMER INC/MARCUS HOOK

Citation	Permit	T 0 0		1 age 7
6)	:	contained a contained	Means of Determining	Compliance
A P	Section	in the Permit	Compliance Status	with Terms &
SILOS	Requirements	25 Pa. Code § 127.511.]	month rolling sum	Intermittent
[25 Pa. Code §129.100]			production rate is calculated and compared	
(Compliance		The permittee shall keep records of	to the production limit.	
demonstration and			VOC emissions calculated	
requirements.)		(a) Polypropylene production on a monthly basis, and 12-month rolling sum;	Plant 2 storage silos stack test results.	
9. 9				
		(b) Silos operation hours each month;	ja -	S
102A - DI ANT 4		(c) VOC emissions from the silos on a monthly basis		2.
POLYPROPYLENE MFG SOURCES	Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]	VOC emissions for the 102A sources are	⊠Continuous
[25 Pa. Code		,	approved emission	
§127.441]		(a) The total Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant Number 1 shall be less than 37.10 tons	calculation methodologies. A 12-month rolling sum is	
terms and		per year on a twelve (12) month rolling basis.	determined and compared against the 37.1 ton per 12	
conditions.)			month rolling sum	
		(b) The polypropylene Plant Nu	eillssion little	
102A - PLANT 1 POLYPROPYLENE MFG SOURCES	Section D - I. Restrictions - Control Device Efficiency	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h) and 25 Pa. Code §129.99.]	Facility has work practices and procedures in place in accordance with	⊠Continuous
[40 CFR Part 60	Restriction(s)	(a) As per 40 OFF 8860 40/-)	applicable regulatory and	1
Performance for		continuous and intermittent emission streams from the process	terms and conditions of	
			מווס ר פוווונ. ווופטפ	

shall be vented and combusted in the flare that is: practices for review and correction of deviation of deviation of deviations of a process. Frequency and visible emission inspections, and the flare to smoke and are monitored. Process. Thermocoupies on the flare to monitor for the presence of a pilot flame and flare flare to monitored. Process control systems in place that both airom and materials of the flare to monitored. Process control systems in place that both airom and flare flare to monitored. Process control systems in place that both airom and flare flare to monitored. Process control systems in place that both airom and flare flare to monitored. Process control systems in place that both airom and flare flare to monitored. Process control systems in place that both airom and flare flare to monitored. Process control systems in place that both airom and flare flare to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare	Citation	Citation Permit	Terms & Conditions Contained	Means of Determining	Compliance
shall be vented and combusted in the flare that is: py (1 (1 (1 py (1		Section	in the Permit	Compliance Status	with Terms & Conditions was:
(1	New Stationary		shall be vented and combusted in the flare that is:	practices include a process for review and	
Process (1	Sources §40 CFR 60.562-1]			correction of deviations	
	(Standards: Process		(1	and visible emission	
	emissions.)			inspections" and the	
			T	facility's total event	
				reporting process.	
				Thermocouples on the flare to monitor for the	
				presence of a pilot flame	
				and flare flame detector	
				were installed and are-	
				monitored. Process	
	3, 130 1	t to the state of		control systems in place	
pilots as needed. Performed weekly observations (modified Method 22) using "Odor and Fugitive Emissions" inspection form submitted to the Department on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare				automatically re-ignite flare	
Performed weekly observations (modified Method 22) using "Odor and Fugitive Emissions" inspection form submitted to the Department on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare				pilots as needed.	
observations (modified Method 22) using "Odor and Fugitive Emissions" inspection form submitted to the Department on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare			20	Performed weekly	
Method 22) using "Odor and Fugitive Emissions" inspection form submitted to the Department on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare				observations (modified	
and rugitive Emissions inspection form submitted to the Department on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare				Method 22) using "Odor	
at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare				and rugitive Emissions	
at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare				to the Department on	
at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare	-			4/16/2009. Additionally,	
system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare				at the flare, an automated	
measure the propensity of the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare				system is in place to	
the flame to smoke and add steam to mitigate smoking. The facility measures flare BTU value using a flare				measure the propensity of	
add steam to mitigate smoking. The facility measures flare BTU value using a flare				the flame to smoke and	
smoking. The facility measures flare BTU value using a flare	2			add steam to mitigate	
The facility measures flare BTU value using a flare				smoking.	
BTU value using a flare				The facility measures flare	
	9 g			BTU value using a flare	

MFG SOURCES [40 CFR Part 60 Standards of Performance for	102A - PLANT 1		Citation
Requirements	Section D - II.		Permit Section
procedures the test methods in appendix A of 40 CFR Part 60 or other methods and procedures specified in 40 CFR §60.564, except as provided under 40 CFR §60.8(b).	(a) In conducting the performance tests required in 40 CFR	iii die remili	Terms & Conditions Contained
made in the process in 2016 pursuant to a PADEP issued plan approval. All applicable testing requirements were completed and	All other flare operating requirements were in the normal operating range. Flare instrumentation and alarms continue to be calibrated and monitored on an established frequency. The emissions generated during this duration will be included in the facility's emission inventory report. Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare. Applicable changes were	Compliance Status	Means of Determining
□Intermittent	⊠Continuous	with Terms & Conditions was:	Compliance

Citation Permit	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
New Stationary		(1) Whenever chan	corresponding test reports	
Sources §40 CFR 60.564]		2	were submitted to PADEP.	
(Test methods and				
procedures.)			20	
102A - PLANT 1 POLYPROPYLENE MFG SOURCES	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]	12-month rolling summation of production is tracked monthly. 12-	⊠Continuous ☐Intermittent
[25 Pa. Code §127.441]		(a) The permittee shall monitor the polypropylene production on a monthly basis.	of VOC emissions is tracked monthly.	
terms and conditions.)		(b) The permittee shall calculate the VOC emissions on a monthly basis and 12 month rolling sum, using DEP approved methods.	. 1	4
102A - PLANT 1 POLYPROPYLENE MFG SOURCES	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 25 Pa. Code §129.100.]	The thermocouples on the flare monitoring for the presence of a pilot flame	⊠Continuous ☐Intermittent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60 5631		(a) As per 40 CFR §60.563(a)(2) and (3), the permittee shall calibrate, maintain, and operate according to manufacturer's specifications the monitoring systems as follows:	were installed, calibrated, maintained, and operated according to manufacturer's specifications and/or good engineering practices.	
(Monitoring requirements.)		(1) A fl	Thermocouples on the flare to monitor for the	
			and flare flame detector were installed and are	

Certification of Continuous or Intermittent Compliance
23-00012 - BRASKEM AMER INC/MARCUS HOOK

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Citation	Citation Bornit			Page 25
Citation	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
128 138			monitored.	
el e			Flare is part of the operator surveillance program and is inspected and maintained as part of plant turnaround work practices.	8
			Braskem America, Inc. has chosen to comply with the car seal option. A monthly car seal inspection program is in place.	
102A - PLANT 1 POLYPROPYLENE MFG SOURCES	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]	12-month rolling summation of production is tracked monthly. 12-	⊠Continuous ☐Intermittent
[25 Pa. Code §127.441]		The permittee shall keep records of	month rolling summation of VOC emissions is tracked monthly	
(Operating permit terms and		(a) the monthly polypopuloso specific	e constant y	
conditions.)		(=)		žii
		(b) the VOC emissions calculated monthly and 12-month rolling sum.	i,	
POLYPROPYLENE MFG SOURCES	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 25 Pa. Code §129.100.]	The following records are available in the performance test	⊠Continuous ☐Intermittent
[40 CFR Part 60 Standards of Performance for		(a) As per 40 CFR §60.565(a)(3), the permittee shall keep an up-to-date, readily-accessible record of the following information	(5/17/2017): All visible emission readings, heat content determinations, flow rate measurements,	
£				

Citation	Permit	Terms & Conditions Contained		
			Weans of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
Performance for		The permittee shall submit to the Administrator semiannual reports of the following recorded information.		
New Stationary Sources §40 CFR 60.565]				
(Reporting and recordkeeping requirements.)		stream has been diverted from the fla		
102A - PLANT 1	Section D - VII	Emergency cost strooms to define the property of the property		
POLYPROPYLENE MFG SOURCES	Additional Requirements	exempt from the requirements of 40 CFR 60.562-1(a)(2) as per 40 CFR §60.560(h).	Statement of law that imposes no compliance obligations and is thus not	⊠Continuous □Intermittent
[40 CFR Part 60 Standards of Performance for			amenable to certification.	
New Stationary Sources §40 CFR 60.560]			40 20 40 11	
(Applicability and designation of			¥	
affected facilities.)				
POLYPROPYLENE MFG SOURCES	Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]	VOC and PM emissions for the 102B sources are calculated monthly using	⊠Continuous ☐Intermittent
[25 Pa. Code §127.441]	7 3	(a) The combined Volatile Organic Compounds (VOC)	approved emission calculation methodologies.	
(Operating permit terms and	S.	24.30 tons per year on a twelve (12) month rolling basis.	determined and compared against the 24.3 ton and	
conditions.)		(h) The combined Particulate Matt	2.1 ton per 12 month rolling sum emission limit.	×
		and matter.	A plan approval permit	

Certification of Continuous of Intermitteent Compliance	OF INTERCEDIA COMPUTATION			
Citation	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
			was issued in 2016 which increased the PM limit. An administrative permit	
			amendment was submitted	
			these requirements into	
			the Title V permit.	*
102B - PLANT 2 POLYPROPYLENE	Section D - I. Restrictions -	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]	Production is tracked monthly, a 12-month	⊠Continuous ☐Intermittent
WIFG SCORCES	Restriction(s)		is calculated and	
[25 Pa. Code §127.441]			compared to the production limit. A plan	
(Operating permit		twelve (12) month rolling basis.	issued in 2016 which	
conditions.)			increased the production limit. An administrative	
			permit amendment was submitted to PADEP to	
			incorporate these requirements into the Title	77
2 10			V permit.	
102B - PLANT 2	Section D - I.	[Additional authority for this permit condition is also derived from	Facility has work practices	⊠Continuous
POLYPROPYLENE	Restrictions - Control Device	25 Pa. Code § 127.512(h) and 25 Pa. Code §129.99.	accordance with	□Intermittent
140 CEB B24 80	Efficiency Restriction(s)		applicable regulatory and	
Standards of	1) (1)		terms and conditions of	
Performance for		shall be vented and combusted in the flare that is:	this Permit. These	-
New Stationary			process for review and	25
60.562-1]			correction of deviations	
Otopicalo: Droppic		(1	reported via routine "odor	

	All other flare operating			
	BTU value using a flare gas analyzer.			
	The facility measures flare			
	smoking.			1
	add steam to mitigate			
	measure the propensity of			e din-
	system is in place to		22300 1830	3
	at the flare, an automated		31-30-	
	4/16/2009. Additionally.			
	inspection form submitted			1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1
	and Fugitive Emissions"			
	Method 22) using "Odor			
	observations (modified			
	Performed weekly			
	pilots as needed.			
(D	automatically re-ignite flare			
	that both alarm and			
	control systems in place			
	monitored. Process			
	were installed and are			
	and flare flame detector			14.
	presence of a pilot flame			T.
	Thermocouples on the			50
	reporting process			11 (2)
	inspections" and the			
1				emissions.)
	Compliance Status	in the Permit	Section	
	Means of Determining			
		Tormo 9 Candillana Cantalana	Permit	Citation

Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare. Applicable changes were made in the process in 2016 pursuant to a PADEP issued plan approval. All applicable testing requirements were completed and corresponding test reports were submitted to PADEP.	other methods and procedures specified in 40 CFR §60.564, except as provided under 40 CFR §60.8(b). (1) Whenever chan		(Test methods and
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare. Applicable changes were made in the process in 2016 pursuant to a PADEP issued plan approval. All applicable testing requirements were completed and corresponding test reports were submitted to PADEP.	other methods and procedures specified in 40 CFR §60.564, except as provided under 40 CFR §60.8(b). (1) Whenever chan		11111111
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare. Applicable changes were made in the process in 2016 pursuant to a PADEP issued plan approval. All applicable testing requirements were completed and corresponding test reports	other methods and procedures specified in 40 CFR §60.564, except as provided under 40 CFR §60.8(b).		Sources §40 CFR 60.5641
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare. Applicable changes were made in the process in 2016 pursuant to a PADEP issued planapproval. All applicable testing requirements were	other methods and procedures specified in 40 CFR §60.564, except as provided under 40 CFR §60.8(b).		Performance for New Stationary
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare. Applicable changes were made in the process in 2016 pursuant to a PADEP issued plan approval. All applicable	procedures the test methods in appendix A of 40 CFR §60.564, other methods and procedures specified in 40 CFR §60.564, except as provided under 40 CFR §60.8(b).		Standards of
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare. Applicable changes were made in the process in 2016 pursuant to a	procedures the test methods in appendix A of 40 CFR Fair of or		140 CFR Part 60
w meter. e net the exit the exit has with the prevent es were	§60.8, the permittee shall use as reference methods and	Testing Requirements	POLYPROPYLENE MFG SOURCES
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the car seal option to prevent vent streams from bypassing the flare.	(a) In conducting the performance tests required in 40 CFR	Section D - II.	102B - PLANT 2
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the car seal option to prevent			
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has chosen to comply with the			
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity. Braskem America has			
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity.			
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit		3.0.0000	
Flare exit velocity is measured using a dedicated flare flow meter. Facility records are			
Flare exit velocity is measured using a dedicated flare flow meter.			
Flare exit velocity is			
			20 2
frequency.			1
on an established			
calibrated and monitored			92
alarms continue to be			Ž.
Compliance Status with Terms & Conditions was:	in the Permit	Section	
Means of Determining Combinative	Terms & Conditions Contained	Permit	Citation Permit

Citation	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
MFG SOURCES			12-month rolling	Intermittent
[25 Pa. Code §127.441]		(a) The permittee shall monitor the polypropylene production monthly.	summation of PM and VOC emissions are kept	
(Operating permit terms and				
conditions.)		(b) The permittee shall calculate the VOC and PM emissions monthly and 12 month rolling sum, using Department approved methods.		
102B - PLANT 2 POLYPROPYLENE MFG SOURCES	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 25 Pa. Code §129.100.]	The thermocouples on the flare monitoring for the	⊠Continuous
[40 CFR Part 60			and flare flame detector	Uniternitient
Standards of Performance for		(a) As per 40 CFR §60.563(a)(2) and (3), the permittee shall calibrate, maintain, and operate according to manufacturer's	were installed, calibrated, maintained, and operated	
New Stationary Sources §40 CFR		specifications the monitoring systems as follows:	manufacturer's	
60.563]			engineering practices.	
(Monitoring		(1) A fl	Thomas 2000 100 100 100 100 100 100 100 100 10	
requirements.)			flare to monitor for the	
30 30 31			and flare flame detector	
0			monitored.	
			Flare is part of the operator surveillance	
			program and is inspected and maintained as part of	
ı	-		plant turnaround work practices.	Si .
			Braskem America, Inc. has	

23-00012 - BRASKEM AME	23-00012 - BRASKEM AMER INC/MARCUS HOOK Citation Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
201			chosen to comply with the car seal option. A monthly	
SERVICE STATES OF THE			car seal inspection program is in place.	
1028 - PLANT 2 POLYPROPYLENE	Section D - IV. Recordkeeping	[Additional authority for this permit condition is also derived from 25 Pa. Code §127.511]	Polypropylene production is monitored monthly.	⊠Continuous
MFG SOURCES	Requirements		12-month rolling	
[25 Pa. Code §127.441]		The permittee shall keep records of	summation of PM and VOC emissions are kept on file.	76
(Operating permit terms and conditions.)		(a) the polypropylene production monthly.		
		(b) the VOC and PM emission calculations monthly and 12 month rolling sum.		
102B - PLANT 2 POLYPROPYLENE MFG SOURCES	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 25 Pa. Code §129.100.]	The following records are available in the performance test (5/17/2017): All visible	⊠Continuous ☐Intermittent
240 CFR Part 60 Standards of Performance for New Stationary		(a) As per 40 CFR §60.565(a)(3), the permittee shall keep an up-to-date, readily-accessible record of the following information measured during each flare performance test, and shal	emission readings, heat content determinations, flow rate measurements, and exit velocity	
Sources §40 CFR 60.565]			determinations; continuous records of the pilot flame and records of all periods	12 S
recordkeeping			of operations during which the pilot flame is absent.	
requirements.)			Control device was operating continuously	
88			during the performance	

Citation	ation Permit	Terms 9. Conditions Contained		- a
		i einis a collaitions contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
			Changes such as production capacity, feedstock type, or catalyst type, or of any replacement, removal or addition of product recovery equipment, are documented within the facility's Management of Change records. Performance test results are maintained in the facility environmental files. (d), Statement of law that imposes no compliance obligations and are thus not amenable to certification	ń.
102B - PLANT 2 POLYPROPYLENE MFG SOURCES	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]	obligations and are thus not amenable to certification. Facility has submitted semiannual reports required under this condition.	⊠Continuous □Intermittent
MFG SOURCES [40 CFR Part 60 Standards of	Requirements	25 Pa. Code § 127.511]	semiannual reports required under this condition.	□Intermittent
Standards of Performance for New Stationary Sources §40 CFR		The permittee shall submit to the Administrator semiannual reports of the following recorded information.	· · · · · · · · · · · · · · · · · · ·	0
(Reporting and recordkeeping requirements.)		(a) All periods recorded under 40 CFR §60.565(b) when the vent stream has been diverted from the fla		

Certification of Continuous or Intermittent Compliance

Page 34

	VOC emissions for the	The Volatile Organic Compounds (VOC) emissions from the		[25 Pa. Code
⊠Continuous: ☐Intermittent	Facility has a leak detection and repair program (work practice) to limit fugitive emissions.	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]	Section D - I. Restrictions - Emission Restriction(s)	103A - PLANT 1 FUGITIVE SOURCES
	determined and compared against the 37.1 ton 12 month rolling sum emission limit.	(b) The polypropylene Plant Nu		
	VOC emissions for the 103A sources are calculated monthly using approved emission calculation methodologies.	(a) The total Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant Number 1 shall be less than 37.10 tons per year on a twelve (12) month rolling basis.	9	[25 Pa. Code §127.441] (Operating permit terms and conditions.)
⊠Continuous ☐Intermittent	Facility has a leak detection and repair program (work practice) to limit fugitive emissions.	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]	Section D - I. Restrictions - Emission Restriction(s)	103A - PLANT 1 FUGITIVE SOURCES
(a			l	(Applicability and designation of affected facilities.)
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			Standards of Performance for New Stationary Sources §40 CFR 60.560]
⊠Continuous ∐Intermittent	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	Emergency vent streams, as defined in 40 CFR §60.561, are exempt from the requirements of 40 CFR 60.562-1(a)(2) as per 40 CFR §60.560(h).	Section D - VII. Additional Requirements	102B - PLANT 2 POLYPROPYLENE MFG SOURCES
with Terms & Conditions was:	Compliance Status	in the Permit	Section	7
Compliance	Means of Determining	Terms & Conditions Contained	Citation Permit	Citation

	contractor to comply with			
	The facility uses a			
	requirement.			
	as described in this			
	calibration gases are use			68
3	place to ensure proper	a		
*	has work practices in			2.5
	sources. The contractor			2.0
	presence of leaking			
	21 to determine the			*
	contractor follows Method			58
	this requirement. The			
	the standards set forth in			
	contractor to comply with			procedures.)
	The facility uses a			(Test methods and
3.	compliance review period.			60.485]
	certification during this	other metho		Sources §40 CFR
	not amenable to	procedures the test methods in appendix A of 40 CFR part 60 or		New Stationary
	thus this requirement is	§60.8, the permittee shall use as reference methods and		Performance for
	compliance review period;	(a) In conducting the performance tests required in 40 CFR		Standards of
	source during this			[40 CFR Part 60
□Intermittent	under 40 CFR 60.8 for this			
	performance tests required	CFR §60.562-2(d) and 25 Pa. Code §129.71.]	Requirements	SOURCES
⊠Continuous	There were no	[Additional authority for this permit condition is derived from 40	Section D - II.	FUGITIVE
	emission limit.		:	1030
	month rolling sum			E.
6	against the 19.6 ton 12			
	determined and compared			
	A 12-month rolling sum is			
	calculation methodologies.			conditions.)
	approved emission			terms and
	calculated monthly using	per year off a twelve (12) month rolling basis.		(Operating permit
	103A sources are	rugitive emission sources of Plant 1 shall not exceed 19.60 tons		ではそのまた。」
Conditions was:				1444-6648
with Terms &	Compliance Status	in the Permit	Section	72:
Compliance	weans of Determining)	12
	Moone of Determine	Terms & Conditions Contained	Permit	Citation

			2								er i	9	35				i i	5								Section	Citation
						e)																				in the Permit	
MOC process and a	program are included in the LDAR database and	discovered which require to be added to the LDAR	and evaluation any components that are	Through periodic review	facility's LDAR program.	equipment is in VOC service, it is added to the	concludes that the piece of	When this determination	judgment is used to	added, engineering	For equipment that is	compliance.	for determining	compared with 500 ppm	background level is	the instrument and the	concentration indicates by	hetween the maximum	the interface as possible.	are traversed as close to	potential leak interfaces	background level. All	21 to determine the	contractor follows Method	this requirement. The	Compliance Status	
D		£					-1	ē							0#3 97 14	16 m	47/ 									with Terms &	

CITATION	Domit			
	relille	lerms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
			periodic review of scheduled maintenance activities to track any changes to LDAR components.	
9			There were no samples collected during the current compliance period	
9° 4 4 91.	9		and thus, imposes no obligations during the current compliance review period.	
103A - PLANT 1 FUGITIVE SOURCES	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]	Polypropylene production is monitored monthly.	Continuous
[25 Pa. Code §127.441] (Operating permit		(a) The permittee shall monitor the polypropylene production on a monthly basis.	12-month rolling summation of VOC emissions are kept on file.	
terms and conditions.)		(b) The permittee shall calculate the VOC emissions on a monthly basis and 12 month rolling sum, using DEP approved methods.	12	
103A - PLANT 1 FUGITIVE SOURCES	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]	VOC emissions are calculated monthly, as well as the 12-month rolling	⊠Continuous □Intermittent
[25 Pa. Code §127.441]		(a) The permittee shall monitor the necessary parameters using	summation.	*
(Operating permit terms and		the VOC emissions, monthly.	8 2	ile Z

⊠Continuous	Polypropylene production is monitored monthly.	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]	Section D - IV. Recordkeeping Requirements	103A - PLANT 1 FUSITIVE
	(e) Statement of law that impose no compliance obligations and are thus not amenable to certification.			(Standards: Valves in gas/vapor service in light liquid service.)
	of the facility LDAR Program. All leaks were repaired within 15 calendar days or placed on delay of repair.	(a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b) and shall comply with 40 CFR §60.482-7(b) through (e), except as provided in		[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-7]
□ Intermittent	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - III. Monitoring Requirements	103A - PLANT 1 FUGITIVE SOURCES
	pumps.) =	(Standards: Pumps in light liquid service.)
	of the facility LDAR Program. Facility is claiming an exemption under (f) the closed vent system condition for several	(a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b), except as provided in 40 CFR §60.482-1(c) and (f) and		[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-2]
⊠Continuous ☐Intermittent	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - III. Monitoring Requirements	103A - PLANT 1 FUGITIVE SOURCES
				conditions.)
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	R INC/MARCUS HOOK Permit	23 00012 - BRASKEM AMER INC/MARCUS HOOK Citation Permit

Section D - V. [Additional authority for this permit condition is also Reporting 40 CFR \$60.562-2(e) and 25 Do Codo \$40.074.1
(2) The permittee may comply with the recordkeeping requirements for the sources in one record
(a)(1) The permittee shall comply with the recordkeeping requirements of 40 CFR §60.486.
Section D - IV. [Additional authority for this permit condition is also Recordkeeping 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.]
(b) the VOC emissions calculated monthly and 12-month rolling sum.
(a) the monthly polypropylene production.
The permittee shall keep records of
Section

æ	deviation reports required by this permit, the flare is operated and maintained in compliance with 40 CFR	(a) Closed vent systems and control devices must comply with the respective provisions specified in 40 CFR § 60.482-10.		[40 CFR Part 60 Standards of Performance for New Stationary
⊠Continuous ☐Intermittent	Except as reported and submitted in this compliance certification or previous semi-annual	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - VI. Work Practice Standards	103A - PLANT 1 FUGITIVE SOURCES
	Additionally, the facility has chosen not to apply for a determination of equivalency during the current compliance period.			(Standards: General.)
	imposes no compliance obligations and is thus not amenable to certification.	(b) Compliance with 40 CFR \$860.482-1 to		New Stationary Sources §40 CFR 60.482-1]
7	of the facility LDAR Program. (c) Statement of law that	(a) The permittee shall demonstrate compliance with the requirements of 40 CFR §§60.482-1 through 60.482-10 or §60.480(e) for all equipment.		[40 CFR Part 60 Standards of Performance for
⊠Continuous ☐Intermittent	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - VI. Work Practice Standards	103A - PLANT 1 FUGITIVE SOURCES
		(2) For each month duri		25
	performance tests conducted during the compliance review period.	(1) Process unit identification.		60.487] (Reporting requirements.)
	requirement and imposes no specific requirements during the current period.	(a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 CFR §60.486:		Standards of Performance for New Stationary Sources §40 CFR
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	Permit	Citation
O mariana			R INC/MARCUS HOOK	23-00012 - BRASKEM AMER INC/MARCUS HOOK

23-00012 - BRASKEM AMER INC/MARCUS HOOK	IER INC/MARCUS HOOK			Page 41
Citation	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
Sources §40 CFR 60.482-10]		(b) As per 40 CFR 860 482-10(f) except as provided in 40 CFB	60.18. Flare is part of the operator surveillance	
(Standards: Closed		(b) As per 40 CFR §60.482-10(f), except as provided in 40 CFR §	program and is inspected	
vent systems and			and maintained as part of	
control devices.)			practices. The closed vent	
			system is part of the	
			facility LDAR Program.	
			Inspections under the	
			facility's mechanical	
			integrity program were	
			conducted during this	
			compliance review period.	
			The closed vent system is	
· 17.			in continuous operations	
8			when emissions may be	
			vented through it.	
			All other flare operating	
			requirements were in the	
			normal operating range.	
			Flare instrumentation and	
	£Į.		alarms continue to be	
			calibrated and monitored	
			on an established	
			frequency.	
FUGITIVE	Section D - VI. Work Practice Standards		Except for compressors	⊠Continuous
SOURCES		[Authority for this permit condition is derived from 40 CFR	which are controlled by 40 CFR 8 60 482-10: and	Intermittent
[40 CFR Part 60		§60.562-2(a).]	compressors that have no	
Standards of			detectable emissions and	
Performance for			are subject to 40 CFR	
New Stationary		(a) Each compressor shall be equipped with a seal system that	compressors are either	
Operate Sto CLY		Section with the brokening leavage of ACC	ognipped with a barrier	

	Certification of Continuous or Intermittent Compliance 23-00012 - BRASKEM AMER INC/MARCUS HOOK Citation Permit Section 60.482-3] (Compressors.)
	e e
	8 65 65X
Sec. 20	

0:404:00	Citation			
CITATION	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
E E			Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	Al
			The (2) Sulzer compressors (vent recovery) are closed system and vent to the flare and are therefore	
13			requirements of paragraphs (a) and (b) of this condition.	
			The facility did not exempt any compressors based on this condition during the compliance review period.	
103A - PLANT 1 FUGITIVE SOURCES	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Facility has work practices and procedures in place, including VOC monitoring	⊠Continuous ☐Intermittent
[40 CFR Part 60 Standards of Performance for New Stationary		(a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions as indicated by an instrument to the contract of the cont	reports maintained as part of the facility LDAR Program.	
New Stationary Sources §40 CFR 60.482-4]		emissions, as indicated by an instrument reading of less than	All leaks were repaired within 5 calendar days or placed on delay of repair.	
(Standards: Pressure relief				
devices in gas/vapor				

	of the facility LDAR			[40 CFR Part 60
□Intermittent	and procedures in place, including VOC monitoring reports maintained as part	40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Practice Standards	FUGITIVE
⊠Continuous	Facility has work practices	[Additional authority for this permit condition is also derived from	Section D - VI. Work	103A - PLANT 1
				(Standards: Open- ended valves or lines.)
		(2)		60.482-6]
-	10			Sources §40 CFR
er er		40 CFR §60.482-1(c) and 40 CFR §60.482-6(d) and (e).		Performance for New Stationary
	Program.	(a)(1) Each open-ended valve or line shall be equipped with a		Standards of
	reports maintained as part of the facility LDAR			[40 CFR Part 60
□Intermittent	and procedures in place, including VOC monitoring	40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Practice Standards	FUGITIVE
⊠Continuous	Facility has work practices	[Additional authority for this permit condition is also derived from	Section D - VI. Work	103A - PLANT 1
	review period.			systems.)
	during the compliance			Sampling connection
	based on this condition	(b) E		(Standards:
	any sampling systems			60.482-5]
	The focility did not exempt			Sources §40 CFR
	to a control device.	provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-5(c).		New Stationary
	transport the purged fluid	closed-purge, closed-loop, or closed-vent system, except as		Standards of
	The closed purge system	The compliant connection exctens shall be equipped with a		[40 CFR Part 60
Lintermittent	a closed purge system.		This involution of the second control of the	SOURCES
	systems are equipped with	40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Practice Standards	ELIGITIVE
⊠Continuous	Sampling connection	radditional authority for this permit condition is also derived from	Section D - VI Work	AOSA DI ANIT 4
,				service.)
Conditions was.				
with Terms &	Compliance Status	in the Permit	Section	
	Mealls of Determining	Terms & Conditions Contained	Citation Permit	Citation

Intermittent	mposes		Requirements	SOURCES
X Continuous	This is a historical	[Additional authority for this permit condition is also derived from	Section D - VII.	103A - PLANT 1
10	compliance review period.			ï
	utilize this exemption for			
	Facility has not chosen to			
	certification			repair)
	not amenable to			(Standards: Delay of
	impose no compliance			60.482-9]
	(b) Statement of law that	micasible williout a process unit snutdown. Repair of this e		Sources §40 CFR
	Program.	detected will be allowed if repair within 15 days is technically		New Stationary
	of the facility LDAR	(a) Delay of repair of equipment for which leaks have been		Standards of
	reports maintained as part			[40 CFR Part 60
Intermittent	including VOC monitoring			
		40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Requirements	SOURCES
⊠Continuous	Facility has work practices [[Additional authority for this permit condition is also derived from	Additional	FUGITIVE
		TANKING TO THE TANKING THE TANKING TO THE TANKING THE TAN	Section D - VIII	103A - PLANT 1
				connectors.)
				service, and
85	8			or heavy liquid
				devices in light liquid
				pressure relief
				liquid service,
				and valves in heavy
	- 00	2000		(Standards: Pumps
	placed on delay of repair.			00.482-8]
	within 15 calendar days or			Sources §40 CFR
· · · · · · · · · · · · · · · · · · ·	All leaks were repaired	heavy liquid service, pressure relief devices in light.		New Stationary
	all.	olfactory, or any other detection method at numbs and valves in		Performance for
	Drogram	(a) If evidence of a potential leak is found by visual, audible		Standards of
with Terms & Conditions was:	Compliance Status	in the remit		
7	· ·		Section	
Compliance	Means of Determining	Terms & Conditions Contained	Permit	Citation

23-00012 - BRASKEM AME	23-00012 - BRASKEM AMER INC/MARCUS HOOK		Manage of Determining	Compliance
Citation	Permit	Terms & Conditions Contained		i
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-21		(a) As per 40 CFR §60.562-2(a), the permittee shall comply with the requirements specified in 40 CFR §§60.482-1 through 60.482-10.	during the current period. LDAR program was instituted at startup. The facility adheres to LDAR work practice for	
(Standards: Equipment leaks of VOC.)		(b) As per 40 CFR §60.562-2(d), the permittee shall comply with the pro	recordkeeping and reporting consistent with 40 CFR 60.485, 60.486, and 60.487.	2
103B - PLANT 2 FUGITIVE SOURCES	Section D - I. Restrictions - Emission	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]	VOC and PM emissions for the 103B sources are calculated monthly using	⊠Continuous □Intermittent
[25 Pa. Code §127.441]		(a) The combined Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant No.2 shall not exceed	calculation methodologies. A 12-month rolling sum is	
(Operating permit terms and conditions.)		24.30 tons per year on a twelve (12) month rolling basis.	against the 24.3 ton and 2.1 ton per 12 month rolling sum emission limit.	
		(b) The combined Particulate Matt	A plan approval permit was issued in 2016 which increased the PM limit. An administrative permit amendment was submitted	
20 E			these requirements into the Title V permit.	
103B - PLANT 2 FUGITIVE SOURCES	Section D - II. Testing Requirements	[Additional authority for this permit condition is derived from 40 CFR §60.562-2(d) and 25 Pa. Code §129.71.]	There were no performance tests required under 40 CFR 60.8 for this source during this	⊠Continuous ☐Intermittent
[40 CFR Part 60 Standards of		(a) In conducting the performance tests required in 40 CFR	compliance review period; thus this requirement is	

												The second secon																				procedures.)	(Test methods and procedures.)	is and		CFR			Section
																																			other metho	procedures the test methods in appendix A of 40 CFR part 60 or other metho	§60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 CFR part 60 or other metho	30.8, the permittee shall use as reference methods and ocedures the test methods in appendix A of 40 CFR part 60 or her metho	in the Permit 60.8, the permittee shall use as reference methods and rocedures the test methods in appendix A of 40 CFR part 60 or ther metho
for determining	compared with 500 ppm	packground level is	hackground lovel is	the instrument and the	concentration indicates by	between the maximum	The arithmetic difference	the interface as possible.	are traversed as close to	potential leak interfaces	background level. All	21 to determine the	contractor follows Method	this requirement. The	the standards set forth in	contractor to comply with the standards set forth in	The facility uses a contractor to comply with the standards set forth in	The facility uses a contractor to comply with the standards set forth in	requirement. The facility uses a contractor to comply with the standards set forth in	as described in this requirement. The facility uses a contractor to comply with the standards set forth in	calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	The state of the s			not amenable to certification during this compliance review period. The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in	not amenable to certification during this compliance review period. The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement. The facility uses a contractor to comply with the standards set forth in
																																					9 2	Conditions was:	with Terms & Conditions was:

					Citation Permit
				Section	Permit
				in the Permit	Terms & Conditions Contained
There were no samples collected during the current compliance period and thus, imposes no obligations during the current compliance review period.	MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components.	Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a	For equipment that is added, engineering judgment is used to confirm the VOC content. When this determination concludes that the piece of equipment is in VOC service, it is added to the facility's LDAR program.	Compliance Status compliance.	Means of Determining
			¥	with Terms & Conditions was:	Compliance

Market Street	Weigner to the		2110-01				1				2517															
(Standards: Pumps in light liquid	Sources §40 CFR 60.482-2]	Performance for	Standards of	140 CER Part 60	SOURCES	103B - PLANT 2	J 17	conditions.)	(Operating permit	·	§127.441]	[25 Pa. Code	SOURCES	FUGITIVE	103B - PLANT 2	es es	conditions.)	(Operating permit	§127.441]	[25 Pa. Code	SOURCES	FUGITIVE	103B - PLANT 2			Citation
				8	Requirements	Section D - III.							Requirements	Monitoring	Section D - III.						Requirements	Monitoring	Section D - III	Section		Permit
	and (f) and (f) and (f) and (f)	40 CFR	(a)(1) Each pump in light liquid service shall be monitored			o derived from			the VOC emissions.	procedures or criteria approved by the Department to determine	The permittee shall monitor the necessary parameters using			25 Pa. Code § 127 5111		(b) The permittee shall calculate the VOC and PM emissions monthly and 12 month rolling sum, using Department approved methods.			(a) The permittee shall monitor the polypropylene production monthly.		3 1 3 1 3	25 Pa. Code \$127 5111		in the Permit	erms & Conditions Contained	Towns 0 0 1141 0
not amenable to certification during this	Facility is not claiming an exemption under this condition (d), thus this is	Program	of the facility LDAR	including VOC monitoring reports maintained as part	and procedures in place,	Facility has work practices						summation.	calculated monthly, as well as the 12-month rolling	VOC emissions are				file.	summation of VOC and PM emissions are kept on	12-month rolling	is monitored monthly.	Polypropylene production		Compliance Status	Means of Determining	
		2		Intermittent		Continuous							Intermittent	⊠Continuous				2			Intermittent	⊠Continuous		with Terms &	Compliance	200

		(b) the VOC and PM emission calculations monthly and 12		
	u	(a) the polypropylene production monthly.		terms and conditions.)
ř.				(Operating permit
9	PM emissions are kept on	The permittee shall keep records of		[25 Pa. Code §127.441]
	12-month rolling		I vedan en en en	SOURCES
□Intermittent	is monitored monthly.	25 Pa. Code §127.511]	Recordkeeping Requirements	FUGITIVE
⊠Continuous	Polypropylene production	radditional authority for this permit condition is also derived from	Continuo D	
	(e) Statement of law that imposes no compliance obligations and is thus not amenable to certification.			(Standards: Valves in gas/vapor service in light liquid service.)
	All leaks were repaired within 15 calendar days or placed on delay of repair.	with 40 CFR §60.482-7(b) through (e), except as provided in		New Stationary Sources §40 CFR 60.482-7]
	of the facility LDAR Program.	(a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b) and shall comply		[40 CFR Part 60 Standards of
□Intermittent	and procedures in place, including VOC monitoring reports maintained as part	40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Monitoring Requirements	FUGITIVE SOURCES
⊠Continuous	Facility has work practices	radditional authority for this permit condition is also derived from	Spotion D - III	
	consed vent system condition for several pumps.			
	Facility is claiming an exemption (f) under the			
	compliance review period.			service.)
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
	Wicklin of Document	Terms & Collditions Collianied	Citation Permit	Citation

Citation	Down it			
	Leillin	lerms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms &
				Conditions was:
		month rolling sum.		
103B - PLANT 2 FUGITIVE	Section D - IV. Recordkeeping	[Additional authority for this permit condition is also derived from 40 CFR \$60.562-2(e) and 25 Pa Code \$120.74.1	This condition imposes no	⊠Continuous
SOURCES	Requirements		than those conditions elsewhere in this Section	□Intermittent
Standards of		(a)(1) The permittee shall comply with the recordkeeping	Facility has work practices	
New Stationary Sources §40 CFR		requirements of 40 CFR 860.486.	and procedures in place, including VOC monitoring	777
60.486]		(2) The permittee may comply with the recordkeeping	of the facility LDAR	#
(Recordkeeping		requirements for the sources in one record	Program	
requirements.)			Facility has work practices and procedures in place	
S)			including marked-up P&IDs showing equipment	
a ch e			equipment not in VOC	
			service.	
			Statement of law that impose no compliance	
			obligations and are thus	
88 10			certification during this compliance review period	
1033 - PLANT 2 FUGITIVE SOURCES	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.]	Facility submitted semiannual reports as	⊠Continuous
[40 CFR Part 60			This is a bistories!	10000000000000000000000000000000000000
Standards of Performance for		(a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 CFR	requirement and imposes	
New Stationary			•	

	operator surveillance	(b) As per 40 CFR §60.482-10(f), except as provided in 40 CFR		8
	60.18. Flare is part of the			Sources §40 CFR
	in compliance with 40 CFR			New Stationary
	operated and maintained	the respective provisions specified in 40 CFR § 60.482-10.		Performance for
	by this permit, the flare is	(a) Closed vent systems and control devices must comply with		Standards of
	deviation reports required			[40 CFR Part 60
	previous semi-annual			0000
∐Intermittent	compliance certification or			SOURCES
]	submitted in this		Practice Standards	FUGITIVE
⊠Continuous	Except as reported and	[Additional authority for this permit condition is also derived from	Section D - VI Work	103R - PLANT 2
	current compliance period.			
	equivalency during the			
	for a determination of			189
	has chosen not to apply	9		General.)
41	Additionally, the facility			(Standards:
	amenable to certification.	(b) Compliance with 40 CER 8860 482-1 to		
	obligations and is thus not			60.482-1]
	imposes no compliance			Sources \$40 CFR
	(b) Statement of law that	§60.480(e) for all equipment.		New Stationary
		requirements of 40 CFR §§60.482-1 through 60.482-10 or		Performance for
	Program.	(a) The permittee shall demonstrate compliance with the		Standards of
Ð	of the facility LDAR			140 CFR Part 60
-	reports maintained as part			
Intermittent	including VOC monitoring			SOURCES
] : :	and procedures in place,	40 CFR \$60.562-2(a) and 25 Pa. Code §129.71.]	Practice Standards	
⊠Continuous	Facility has work practices	[Additional authority for this permit condition is also derived from	Section D - VI. Work	103B - PLANT 2
		(2) For each month duri		
	compliance review period.			oder of the control o
	conducted during the	(1) Process unit identification.		requirements.)
	performance tests	GOOD DE SENDE DE SENDE		(Reporting
	There were no			60.487]
	during the current period.	§60.486:		Sources §40 CFR
1				
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compilance	Means of Determining	Terms & Conditions Contained	Permit	Citation
Compliance	S. C.		R INC/MARCUS HOOK	23-00012 - BRASKEM AMER INC/MARCUS HOOK

and 40 CFR §60.482-3(h), (i), and (
(a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-3(h) (i) and (
(Authority for this permit condition is derived from 40 CFR
9
- 1
in the Dormit

in the Permit				
in the Permit Compliance Status atmosphere or are vented to a control device. The AC compressors are operated with the barrier fluid at a pressure greater than the compressor stuffing box pressure.	are equipped with a sensor (low oil level) that will detect failure of the seal system and/or the barrier fluid system.	The barrier fluid systems are equipped with alarms to indicate failure of the seal system and/or the barrier fluid system. The criterion used to indicate failure of the seal system	is a low oil level alarm.	is a low oil level alarm. (f) Statement of law that impose no compliance obligations and are thus

FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-4] (Standards: Pressure relief devices in gas/vapor service.)			Citation Permit
Practice Standards		Section	Permit
(a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than		in the Permit	Terms & Conditions Contained
Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. All leaks were repaired within 5 calendar days or placed on delay of repair.	including VOC monitoring reports maintained as part of the facility LDAR Program. The (2) Sulzer compressors (vent recovery) are closed system and vent to the flare and are therefore exempt from the requirements of paragraphs (a) and (b) of this condition. The facility did not exempt any compressors based on this condition during the compliance review period.	Compliance Status	Means of Determining
⊠Continuous □Intermittent		with Terms & Conditions was:	Compliance

	g	olfactory, or any other detection method at pumps and valves in		Performance for
	of the facility LDAR	(a) If evidence of a potential leak is found by visual, audible,		[40 CFR Part 60
⊠Continuous ☐Intermittent	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - VI. Work Practice Standards	103B - PLANT 2 FUGITIVE SOURCES
]	8	(2		(Standards: Open- ended valves or lines.)
	of the facility LDAR Program.	(a)(1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-6(d) and (e).		[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-6]
□Intermittent	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - VI. Work Practice Standards	103B - PLANT 2 FUGITIVE SOURCES
]	The facility did not exempt any sampling systems based on this condition during the compliance review period.	(b) E		60.482-5] (Standards: Sampling connection systems.)
	The closed purge system is designed to capture and transport the purged fluid to a control device.	(a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-5(c).		[40 CFR Part 60 Standards of Performance for New Stationary Sources \$40 CFR
⊠Continuous ☐Intermittent	Sampling connection systems are equipped with a closed purge system.	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - VI. Work Practice Standards	103B - PLANT 2 FUGITIVE SOURCES
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
compliance	Bleaus of Defermining	lerms & Conditions Contained	Permit	Citation

Citation Permit	Dormit Dormit	4		Page 57
Citation	remit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
New Stationary Sources §40 CFR 60.482-8]		heavy liquid service, pressure relief devices in light	(b) Statement of law that impose no compliance obligations and are thus	
(Standards: Pumps			not amenable to	
and valves in heavy			certification	
liquid service,			Escility has work program	
pressure relief			racility has work practices	
devices in light liquid			including VOC monitoring	
or heavy liquid			reports maintained as next	
service, and			of the facility I DAR	
connectors.)			Program. All leaks were	
			repaired within 15	
8			calendar days or placed on delay of repair.	
1038 - PLANT 2	Section D - VII.	[Additional authority for this permit condition is also derived from	Espility has work protices	Continue
FUGITIVE	Additional		and procedures in place	Continuous
טטטגטדט	redamente		including VOC monitoring	□Intermittent
[40 CFR Part 60			reports maintained as part	
Standards of		(a) Delay of repair of equipment for which leaks have been	of the facility LDAR	
Performance for		detected will be allowed if repair within 15 days is technically	Program.	
New Stationary		infeasible without a process unit shutdown. Repair of this e	(b) Statement of law that	
60 482-91			impose no compliance	
00.101			obligations and are thus	
(Standards: Delay of			not amenable to certification	
			Facility has not chosen to	
8			utilize this exemption for repair during this	
-			compliance review period.	
103B - PLANT 2	Section D - VII.	[Additional authority for this permit condition is also derived from	This is a historical	⊠Continuous
FUGITIVE	Requirements	25 Pa. Code § 127.512(h).]	requirement and imposes	

Continuous	Records of the MSDS and waste manifest are maintained onsite. Facility	The permittee shall monitor and record the solvent usage on a monthly basis.	Section D - III. Monitoring Requirements	105 - MAINTENANCE PARTS WASHER
	replaced solvent based unit with aqueous based unit.	(b) Paragraph (a) does not apply:(i) To cold cleaning machines used in extreme cleaning	3/2	(Degreasing operations)
□ Intermittent	Facility maintains MSDS's for the material used in this equipment which demonstrates the adherence to the vapor pressure and VOC content requirements. Facility has	(a) The permittee shall not use any solvent with a vapor degreaser of 1.0 millimeter of mercury (mmHg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.	Section D - I. Restrictions - Emission Restriction(s)	105 - MAINTENANCE PARTS WASHER [25 Pa. Code §129.63]
	The facility adheres to LDAR work practice for recordkeeping and reporting consistent with 40 CFR 60.486 and 60.487.			म ट्री
%	elect this option during the current compliance period. Facility has chosen not to apply for a determination of equivalency during the current compliance period.	(b) As per 40 CFR §60.562-2(d), the permittee shall comply with the pro		Sources §40 CFR 60.562-2] (Standards: Equipment leaks of VOC.)
☐Intermittent	no specific requirements during the current period. LDAR program was instituted at startup. Facility has chosen not to	(a) As per 40 CFR §60.562-2(a), the permittee shall comply with the requirements specified in 40 CFR §§60.482-1 through 60.482-10.		SOURCES [40 CFR Part 60 Standards of Performance for
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	Citation Permit	Citation Citation

		Department may be used to comply with 25 Pa. Code 129.63.		
		(e) other appropriate documentation acceptable to the		
		(d) a Material Safety Data Sheet (MSDS), or		77
	unit.	(c) a certificate that corresponds to a number of sales,		
	unit with aqueous based	(b) a bill of sale,		operations)
	procedures. Facility has	(a) an invoice,		(Dograda
	through equipment labeling and operating			[25 Pa. Code &129.63]
□Intermittent	equipment in accordance with these requirements	The permittee shall maintain records of:	Requirements	PARTS WASHER
⊠Continuous	Facility operates this		Section D - IV. Recordkeeping	MAINTENANCE
	unit with aqueous based unit.			2
	requirements. Facility has replaced solvent based			2 100
	pressure and VOC content	basis.		conditions.)
	adherence to the vapor	(b) VOC emissions on a monthly and 12-month rolling sum		terms and
	equipment which			
	material used in this	(a) Monthly solvent usage;		\$127,441]
□Intermittent	supplier. Facility			
] [provided by the material		Requirements	PARTS WASHER
Continuous	This information has been	The permittee shall keep records of:	Section D - IV.	MAINTENIANCE
				conditions.)
				terms and
	based unit.			(Operating permit
24,	based unit with aqueous			§127.441]
	har ropland on the			[25 Pa. Code
with Terms & Conditions was:	Compliance Status	in the Permit	Section	29
Compliance	Means of Determining	erms & Conditions Contained		
		T	Permit	Citation

Section D - VI. Work A E Practice Standards V FR Section D - VI. Work Practice Standards P Restrictions - Control Device Efficiency Restriction(s)	23-00012 - BRASKEM AMER INC/MARCUS HOOK Citation Permit	Permit Permit	Terms & Conditions Contained	Means of Determining	Compliance
Section D - VI. Work Practice Standards VPractice Standards VVI. Work Practice Standards VVIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII		Section	in the Permit	Compliance Status	with Terms & Conditions was:
Section D - VI. Work Practice Standards Restriction D - I. Restrictions - Control Device Efficiency Restriction(s)	TENANCE	7	A person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:	This information has been provided by the solvent supplier. Facility	⊠Continuous ☐Intermittent
Section D - VI. Work NANCE Practice Standards WASHER Code Sing ns) Section D - VI. Work Practice Standards Restriction D - I. Restrictions - Control Device SS & Efficiency N 4 Restriction(s) Restriction(s) Restriction(s)	25 Pa. Code			material used in this	2 8
Section D - VI. Work NCE Practice Standards ASHER de PYLENE Section D - I. Restrictions - Control Device Efficiency ATT 60 of nce for nonary AO CFR	129.63]		(i) The name and address of the solvent supplier.	equipment which demonstrates the	25
Section D - VI. Work ANCE Practice Standards restriction D - I. Restrictions - Control Device Efficiency ARESTRICTION Restriction(s) PYLENE Restriction(s) Restriction(s)	Degreasing			adherence to the vapor pressure and VOC content	
Section D - VI. Work TENANCE TS WASHER a. Code 63] reasing ations). PROPYLENE CESS & ERN 4 PROPYLENE Restrictions - Control Device Efficiency ERN 4 Restriction(s) FR Part 60 dards of Stationary ces §40 CFR	200		(ii) The type of solvent including the product or vendor	requirements. Facility has replaced solvent based	
Section D - VI. Work TENANCE Practice Standards a. Code 63] a. Code 63] reasing ations). PROPYLENE Section D - I. PROPYLENE Restrictions - CESS & Efficiency ERN 4 Restriction(s) FR Part 60 dards of Ormance for Stationary Ces §40 CFR	3			unit with aqueous based unit.	
ode ode ode ing is) s) Section D - 1. Restrictions - Control Device Efficiency 14 Restriction(s) Part 60 Is of ance for fionary \$40 CFR	TENANCE	on D - VI. Work ice Standards	(1) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.	Facility operates this equipment in accordance with these requirements	⊠Continuous ☐Intermittent
ing ing ing Section D - 1. R Restrictions - R Restrictions - Restrictions - R Restriction(s) Restriction(s) Part 60 Is of Is o	AX O WYOURS			through equipment	
Section D - I. Restrictions - Control Device Efficiency Restriction(s) art 60 of of of of OF OF OF OF OF Restriction(s)	25 Pa. Code §129.63]		(2) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:	labeling and operating procedures. Facility has replaced solvent based	
PYLENE Section D - I. Restrictions - Control Device Efficiency Restriction(s) art 60 of ce for nary 40 CFR	(Degreasing operations)			unit with aqueous based unit.	5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5
PYLENE Section D - 1. Restrictions - Control Device Efficiency Restriction(s) art 60 of ce for nary 40 CFR			(i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (3). In addit	B. 17	
Control Device Efficiency Restriction(s) art 60 of of ce for nary 40 CFR	PYLENE	ion D - I.	[Additional authority of this permit is also derived from 25 Pa. Code §129.99.]	Source emissions were directed to this control	Continuous
70	&	rol Device lency riction(s)		device during this period as evidenced by facility	Dillicol in
for CFR			(a) As per 40 CFR §60.562-1(a) and (d), vent stream emissions	has confirmed that the	
3000	Standards of Performance for			SXL flare was operating in accordance with these	
	New Stationary		requirements specified in 40 CFK 800. To at	requirements during this reporting period other than	

	Comply with			
	The facility uses a			
(TITS)	place to ensure proper calibration gases are use as described in this requirement.			90) 20
1	contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in			
A STATE OF THE STA	The facility uses a contractor to comply with the standards set forth in this requirement. The			(Test methods and procedures.)
	review period.	other metho		New Stationary Sources §40 CFR 60.485]
	requirement is not amenable to certification	\$60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 CFR part 60 or		Standards of Performance for
Intermittent	under 40 CFR 60.8 during this compliance review period: thus this	(a) In conducting the performance		CAVERN 4
⊠Continuous	There were no performance tests required	[Additional authority for this permit condition is derived from 40 CFR §60.562-2(d) and 25 Pa. Code §129.71.]	Testing Requirements	SPLITTER PROCESS &
			Specifican D	106 - PROPYI ENE
K	less than 300 BTU/scf on one occasion on 9/1/2017.			N 10 10 10 10 10 10 10 10 10 10 10 10 10
E A	Logistics, the sample result of the flare gas was			15 .
	According to Sunoco			(Standards: Process emissions.)
	events listed in this report.			60.562-1]
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	l erms & Conditions Contained	S - GI	
			Dermit	Citation

the standards set forth in this requirement. The conditions was: the standards set forth in this requirement. The background fevel. All potential leak interfaces are traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background fevel is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR project and maintenance advisites to track any components and a periodic review of general pe	Citation	Citation Permit	Terms & Conditions Contained	Means of Determining	Compliance
the slandards set forth in this requirement. The contractor follows wethout 21 to determine the background level. All potential teak interfaces as ossible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. Though periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR displaces and a periodic review of ascheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VoC content.		Section	in the Permit	Compliance Status	with Terms & Conditions was:
21 to determine the background level. All potential leak interfaces as close to the interface as cossible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR disabses and monitored. Braskem has a periodic review of scheduled maintenance activities to track any changes to LDAR. For equipment is used to confirm the VOC content.	ï			the standards set forth in this requirement. The contractor follows Method	
background level. All potential leak interfaces are traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR clatabase and moc process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				21 to determine the	
are traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				background level. All potential leak interfaces	
the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				are traversed as close to	A.
The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.	51.52. 52.			the interface as possible.	
concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Brasken has a MOC process aind a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, angineering judgment is used to confirm the VOC content.				The arithmetic difference	
the instrument and the background level is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment is used to confirm the VOC content.				between the maximum	
background level is compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a M/OC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment its used to confirm the VOC content.		ă.		concentration indicates by	
compared with 500 ppm for determining compared with 500 ppm for determining compliance. Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				the instrument and the	
Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				compared with 500 npm	
Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				for determining	
Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				compliance.	1,
and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				Through periodic review	
discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				and evaluation any	
to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				discovered which require	
the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.	įss			to be added to the LUAN	
monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.	ti			the LDAR database and	20
periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.	5			monitored. Braskem has a	
ice	i S			MOC process and a	e G
activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				scheduled maintenance	
changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content.				activities to track any	
For equipment that is added, engineering judgment is used to confirm the VOC content.				changes to LDAR	
For equipment that is added, engineering judgment is used to confirm the VOC content.				components.	
judgment is used to confirm the VOC content.				For equipment that is	
confirm the VOC content.				added, engineering indoment is used to	
				confirm the VOC content.	

(Op term con SPI	\$125 \$12 (Op tern	\$125 (Or tern	\$1;	;	CA PR	10									
[40 CFR Part 60 Standards of	106 - PROPYLENE SPLITTER PROCESS & CAVERN 4	Conductions.)	(Operating permit terms and	[25 Pa. Code §127.441]	SPLITTER PROCESS & CAVERN 4	106 - PROPYI FNF	æ	e e	10					Citation	Citation
	Section D - III. Monitoring Requirements				Monitoring Requirements	Section D - III	9						Section	remill	Down it
(a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	 b. The permittee shall calculate the VOC emissions on a monthly basis and 12-month rolling sum, using Department a 	 a. The permittee shall monitor and record the polypropylene production on a monthly basis. 		[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]								in the Permit	Terms & Conditions Contained	
of the facility LDAR Program	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part			summation of VOC emissions are kept on file.	Polypropylene production is monitored monthly. 12-month rolling		obligations during the current compliance review	collected during the current compliance period	facility's LDAR program.	equipment is in VOC service, it is added to the	When this determination concludes that the piece of	1000	Compliance Status	Means of Determining	
	⊠Continuous □Intermittent	⊕ ≥ ∨			⊠Continuous ☐Intermittent							Conditions was:	with Terms &	Compliance	- age 00

	discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a			19 14
	Through periodic review and evaluation any components that are			service.)
	(e) Statement of law that imposes no compliance obligations and is thus not amenable to certification.			(Standards: Valves in gas/vapor service in light liquid
	Program. All leaks were repaired within 15 calendar days or placed on delay of repair.	(a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b) and shall comply with 40 CFR §60.482-7(b) through (e), except as provided in		[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR
⊠Continuous □Intermittent	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - III. Monitoring Requirements	106 - PROPYLENE SPLITTER PROCESS & CAVERN 4
	exemption under this condition (d), thus this is not amenable to certification during this compliance review period. Facility is claiming an exemption under (f) the closed vent system condition for several pumps.	and	*	New Stationary Sources §40 CFR 60.482-2] (Standards: Pumps in light liquid service.)
with Terms & Conditions was:	Compliance Status	in the Permit	Section	2 ²
Compliance	Means of Determining	Terms & Conditions Contained	Permit	Citation Permit

	and procedures in place,			
	Facility has work practices		*4	(Recordkeeping
	reports maintained as part of the facility LDAR Program	(2) The permittee may comply with the recordkeeping requirements for the sources in one record		New Stationary Sources §40 CFR 60.486]
p v	Facility has work practices and procedures in place, including VOC monitoring	(a)(1) The permittee shall comply with the recordkeeping requirements of 40 CFR §60.486.		Standards of Performance for
☐Intermittent	additional requirements than those conditions elsewhere in this Section.	40 CFR §60.562-2(e) and 25 Pa. Code §129.71.]	Recordkeeping Requirements	PROCESS & CAVERN 4
O Satisman	This condition imposes no	[Additional authority for this permit condition is also derived from	Section D - IV.	106 - PROPYLENE
		b. The VOC emissions on a monthly basis and 12-month rolling sum.		
		a. The polypropylene production on a monthly basis		conditions.)
		The permittee shall keep records of		(Operating permit
bies	emissions are kept on file.			[25 Pa. Code §127.441]
	12-month rolling	25 Pa. Code § 127.511]		CAVERN 4
Continuous	is monitored monthly.	[Additional authority for this permit condition is also derived from	Recordkeeping Requirements	SPLITTER PROCESS &
			Section D - IV.	106 - PROPYLENE
	activities to track any changes to LDAR components.			,
	periodic review of			
with Terms & Conditions was:	compliance Status			
Compilation		in the Domit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	Permit	Citation
rage oo			הימיסוגבויי אייבוי וועכוווארויטס חסטא	

1160337				Tel office for
	requirement and imposes no specific requirements	(a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 CFR	2	[40 CFR Part 60 Standards of
	This is a historical		3	CAVERN 4
□Intermittent	semiannual reports as required by this condition	40 CFR §60.562-2(e) and 25 Pa. Code §129.71.]	Reporting Requirements	SPLITTER FROCESS &
⊠Continuous	Facility submitted	in Additional authority for this permit condition is also derived from		requirements.)
				recordkeeping
		(i) All periods when now is indicated it now i		00.303]
				New Stationary Sources §40 CFR
		divert the emission stream away from the flare:		Standards of Performance for
ei e	program is in place.	As per 40 CFR §60.565(b)(2), the permittee shall keep the		740 CFR Part 60
	car seal inspection			CAVERN 4
□Intermittent	chosen to comply with the car seal option. A monthly	Code §129.100.]	Recordkeeping Requirements	SPLITTER
⊠ Continuous	Braskem America, Inc. has	[Additional authority of this permit is also derived from 25 Pa.	Section D - IV.	106 - PROPYLENE
1	compliance review period			2
	certification during this			
	obligations and are thus			12 31
	impose no compliance			
	service.	*		
	equipment not in VOC			
	in VOC service, as well as			
	including marked-up			requirements.)
Conditions was:	Compliance Status	in the Permit	Section	A A A A A A A A A A A A A A A A A A A
with Terms &	O manifestor Otation		a de la constanta de la consta	
Compliance	Means of Determining	Terms & Conditions Contained	Citation Permit	Citation

Citation Bornit	EK INC/MIAKCUS HOOK			Page 6/
CitatiOII	Fermit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
New Stationary Sources §40 CFR 60.487]		§60.486:	during the current period.	
(Reporting requirements.)		(1) Process unit identification.	performance tests conducted during the compliance review period.	
		(2) For each month duri	3	
198 - PROPYLENE SPLITTER PROCESS & CAVERN 4	Section D - V. Reporting Requirements	The permittee shall submit to DEP semiannual reports of all periods recorded under 40 CFR §60.565(b) when the vent stream has been diverted from the flare.	Braskem has submitted the applicable information in the semi-annual reports. No vent streams were	⊠Continuers ☐Intermittent
[40 CFR Part 60 Standards of Performance for			diverted from the flare in this reporting period.	
3ources §40 CFR 60.565]				Ŋ
(Reporting and recordkeeping requirements.)				
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Facility has work practices and procedures in place, including VOC monitoring	⊠Continuous ☐Intermittent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-1]		(a) The permittee shall demonstrate compliance with the requirements of 40 CFR §§60.482-1 through 60.482-10 or §60.480(e) for all equipment.	of the facility LDAR Program. (c) Statement of law that imposes no compliance obligations and is thus not amenable to certification.	2 1 628 2 1 628 2 1 2 2 3 2 2 3 2 2 3 2 2 3
38				

☐ Intermittent	Except for compressors which are controlled by 40 CFR § 60.482-10; and compressors that have no	[Authority for this permit condition is derived from 40 CFR	Section D - VI. Work Practice Standards	106 - PROPYLENE SPLITTER PROCESS &
	when emissions may be vented through it.			¥
	conducted during this compliance review period. The closed vent system is			
0	Inspections under the facility's mechanical integrity program were			18
	on 9/1/2017. The closed vent system is part of the facility LDAR Program.	Ti di	8	vent systems and control devices.)
	gas was less than 300 BTU/scf on one occasion			(Standards: Closed
i d	Sunoco Logistics, the sample result of the flare	(b) As per 40 CFR §60.482-10(f), except as provided in 40 CFR §	in the second	Sources §40 CFR 60.482-10]
1974 (1987) 1980) 1981 1981 1981	Sunoco flare is operated and maintained in compliance with 40 CFR 60.18. According to	(a) Closed vent systems and control devices must comply with the respective provisions specified in 40 CFR § 60.482-10.		[40 CFR Part 60 Standards of Performance for New Stationary
⊠Intermittent	submitted in Sunoco's compliance certification or previous semi-annual deviation reports, the	[Additional authority for this permit condition is also derived ironing 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - VI. Work Practice Standards	106 - PROPYLENE SPLITTER PROCESS & CAVERN 4
	Additionally, the facility has chosen not to apply for a determination of equivalency during the current compliance period.	(b) Compliance with 40 CFR §§60.482-1 to		(Standards: General.)
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	Permit	Citation Permit

DISCOULT DISCONDING AW	Citation AIMER INCIMARCUS HOOK			Page 69
Citation	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
CAVERN 4 [40 CFR Part 60		§60.562-2(a).]	detectable emissions and are subject to 40 CFR	
Standards of Performance for		(a) Each compressor shall be equipped with a seal system that	60.482-3(i), all remaining compressors are either	
New Stationary Sources §40 CFR		// 01	equipped with a barrier fluid system that prevents	
60.482-3]		and 40 CFR §60.482-3(h), (i), and (leakage of VOC to the	
(Compressors.)			to a control device.	.1
×			(f) Statement of law that	
2			obligations and are thus not amenable to	
6 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			certification	1 290
			and procedures in place, including VOC monitoring	
# S			of the facility LDAR Program.	
			The facility did not exempt any compressors based	
			on this condition during the compliance review period.	
106 - PROPYLENE SPLITTER	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Facility has work practices and procedures in place	⊠Continuous -
CAVERN 4			including VOC monitoring reports maintained as part	□Intermittent
[40 CFR Part 60 Standards of		(a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable	of the facility LDAR Program.	2010 (Taxasan
		errissions, as indicated by an instrument reading of less than	All leaks were repaired	22

Certification of Continuous or Intermittent Compliance 23-5:012 - BRASKEM AMER INC/MARCUS HOOK 60.482-4] Sources §40 CFR **New Stationary** PROCESS & SPLITTER service.) devices in gas/vapor Pressure relief (Standards: 106 - PROPYLENE Sources §40 CFR Performance for Standards of [40 CFR Part 60 CAVERN 4 SPLITTER systems.) Sampling connection 60.482-5] New Stationary 60.482-6] Sources §40 CFR New Stationary Performance for Standards of [40 CFR Part 60 CAVERN 4 PROCESS & 106 - PROPYLENE (Standards: Citation Section D - VI. Work Practice Standards Practice Standards Section D - VI. Work Section Permit 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] [Additional authority for this permit condition is also derived from (b) E... [Additional authority for this permit condition is also derived from provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-5(c). closed-purge, closed-loop, or closed-vent system, except as 2... 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.] (a) Each sampling connection system shall be equipped with a 40 CFR §60.482-1(c) and 40 CFR §60.482-6(d) and (e). cap, blind flange, plug, or a second valve, except as provided in (a)(1) Each open-ended valve or line shall be equipped with a Terms & Conditions Contained in the Permit placed on delay of repair within 5 calendar days or a closed purge system. Sampling connection is designed to capture and systems are equipped with during the compliance any sampling systems to a control device. transport the purged fluid The closed purge system and procedures in place, Facility has work practices review period. based on this condition The facility did not exempt Program. reports maintained as part including VOC monitoring of the facility LDAR Means of Determining Compliance Status □Intermittent Conditions was: **⊠**Continuous ☐Intermittent with Terms & Compliance Page 70

	46.2			
	āl	Three (3) propylene dryers (V-54A, V54-B, and V-54C)		conditions.)
		Cavern #4	9	(Operating permit terms and
20000		Two (2) splitters and associated pre-treatment and post-treatment equipment		[25 Pa. Code §127.441]
⊠Continuous ☐Intermittent	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	The source consists the following equipment and associated vent emissions:	Additional Requirements	SPLITTER PROCESS & CAVERN 4
				connectors.)
				service, and
				or heavy liquid
12				devices in light liquid
				pressure relief
				liquid service.
(E)				and valves in heavy
	######################################			(Standarde: Dumps
	placed on delay of repair.			60 482-8]
	All leaks were repaired within 15 calendar days or			New Stationary
		heavy liquid service, pressure relief devices in light		Performance for
	Program.	olfactory, or any other detection method at number and valvos is		Standards of
	reports maintained as part of the facility I DAR	(a) If evidence of a potential lock is found to the		140 CER Part 60
□Intermittent	including VOC monitoring			CAVERN 4
⊠Continuous	Facility has work practices and procedures in place,	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Practice Standards	SPLITTER PROCESS &
			Continue VI What	106 - PROPVI ENE
				lines.)
				ended valves or
Conditions was:				(Standards: Open-
with Terms &	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	Terrific	
		T	Permit	Citation

	The facility adheres to LDAR work practice for recordkeeping and			
1	of equivalency during the current compliance period.			Equipment leaks of VOC.)
	apply for a determination	the pro		(Standards:
3	Facility has chosen not to	(b) As per 40 CFR §60.562-2(d), the permittee shall comply with		60.562-2]
	elect this option during the current compliance period.			New Stationary Sources \$40 CFR
	Facility has chosen not to			Standards of Performance for
59	instituted at startup.	(a) As per 40 CFR §60.562-2(a), the permittee shall comply with		[40 CFR Part 60
	during the current period.		9	CAVERN 4
□Intermittent	no specific requirements	25 Pa. Code § 127.512(h).]	Additional Requirements	SPLITTER BROCESS &
⊠Continuous .	This is a historical	[Additional authority for this permit condition is also derived from	Section D - VII.	106 - PROPYLENE
	repair during this compliance review period.			120
	utilize this exemption for			repair.)
		W 22		(Standards: Delay of
	certification			60.482-9]
Ť	obligations and are thus			Sources §40 CFR
	impose no compliance			Performance for
ži	(b) Statement of law that	infeasible without a process unit shutdown. Repair of this e		Standards of
	of the facility LDAR Program.	(a) Delay of repair of equipment for which leaks have been		140 CFR Part 60
	reports maintained as part		Todaii cinono	PROCESS &
□Intermittent	and procedures in place, including VOC monitoring	40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Additional	SPLITTER
⊠Continuous	Facility has work practices	[Additional authority for this permit condition is also derived from	Section D - VII.	106 - PROPYLENE
Conditions was:			Section	
with Terms &	Compliance Status	in the Permit		
Compilation	Means of Determining	Terms & Conditions Contained	Citation Permit	Citation

		New Stationary Sources §40 CFR 60.562-1] (Standards: Process emissions.)	[40 CFR Part 60 Efficiency Standards of Restriction(s)	UNLOADING RACK Control Device	(Operating permit terms and conditions.)	[25 Pa. Code Efficiency §127.441] Restriction(s)	UNLOADING RACK Restrictions -		Section	Citation
		from thi C100) t requirer		Φ		ŏ			tion	
		from this source shall be directed to Sunoco Flare (Source ID C100) that shall be operated in compliance with the requirements specified in 40 CFR §60.18 at	(a) As per 40 CFR §60.562-1(a) and (d), vent stream emissions	[Additional authority of this permit is also derived from 25 Pa. Code §129.99.]			When the loading of rail cars with propylene occurs at this source, the air emissions shall be routed to a flare that meets		in the Permit	Terms & Conditions Contained
Braskem America has chosen to comply with the car seal option to prevent	According to Sunoco Logistics, the sample result of the flare gas was less than 300 BTU/scf on one occasion on 9/1/2017.	has confirmed that the SXL flare was operating in accordance with these requirements during this reporting period other than events listed in this report.	device during this period as evidenced by facility instrumentation. Braskem	Source emissions were directed to this control	According to Sunoco Logistics, the sample result of the flare gas was less than 300 BTU/scf on one occasion on 9/1/2017.	device during this period as evidenced by facility instrumentation.	Source emissions were	reporting consistent with 40 CFR 60.486 and 60.487.	Compliance Status	Means of Determining
			⊠Intermittent	Continuous		⊠Intermittent	Continuous		with Terms & Conditions was:	Compliance

23-00012 - BRASKEM AME	23-00012 - BRASKEM AMER INC/MARCUS HOOK Citation Permit	Terms & Conditions Contained	Means of Determining	Compliance
a a	Section	in the Permit	Compliance Status	with Terms & Conditions was:
. A. C.			vent streams from bypassing the flare.	90,0
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60	Section D - II. Testing Requirements	[Additional authority for this permit condition is derived from 40 CFR §60.562-2(d) and 25 Pa. Code §129.71.]	There were no performance tests required under 40 CFR 60.8 during this compliance review	⊠Continuous ☐Intermittent
Standards of Performance for New Stationary Sources §40 CFR 60.485]		(a) In conducting the performance tests required in 40 CFR §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 CFR part 60 or other metho	period; thus this requirement is not amenable to certification during this compliance review period.	8
(Test methods and procedures.)			The facility uses a contractor to comply with the standards set forth in this requirement. The	
e H			21 to determine the presence of leaking	.7
e : 88 88 89			has work practices in place to ensure proper	A PAGE STATE
e 2			as described in this requirement.	
			The facility uses a contractor to comply with the standards set forth in) is
			this requirement. The contractor follows Method 21 to determine the background level. All	,
			potential leak interfaces are traversed as close to	

			Set	
			Section	
			in the Permit	Terms & Conditions Contained
There were no samples	components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components. For equipment that is added, engineering judgment is used to confirm the VOC content. When this determination concludes that the piece of equipment is in VOC service, it is added to the facility's LDAR program.	the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance. Through periodic review	Compliance Status	Means of Determining
			with Terms & Conditions was:	Compliance

	condition for several pumps.			S.
	closed vent system			20
	exemption under (f) the			88
	Facility is claiming an			001 100.)
	compliance review period.			service)
	certification during this			in light liquid
	not amenable to			(Standards: Pumps
	exelliption (d) thus this is			50.482-2]
5. G.	exemption under this	and		Sources §40 CFR
		monthly to detect leaks by the methods specified in 40 CFR		New Stationary
	Program	(a)(1) Each pump in light liquid service shall be monitored		Performance for
	of the facility LDAR			Standards of
	reports maintained as part		0.0	140 CFR Part 60
□Intermittent	including VOC monitoring	40 CFR §60.562-2(a) and 25 Pa. Code §129.71.	Monitoring Requirements	UNLOADING RACK
⊠ Continuous	Facility has work practices	[Additional authority for this permit condition is also derived from	Section D - III.	107 - PROPYLENE
				terms and conditions.)
				;
	וומכאוווט אףו פמטאו פפר.			§127.441]
	tracked in a facility		Requirements	
Intermittent	loaded and unloaded are	loaded and unloaded in barrels of each loading.	Monitoring	UNLOADING RACK
⊠ Continuous	The amount of materials	The permittee shall monitor and record the amount of materials	Section D - III.	107 - PROPYLENE
	period.			
	current compliance review			2-
8 8	obligations during the			
	and thus, imposes no			9
	current compliance period			1.5
	collected during the			
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
000	Wealls of Determining	Terms & Conditions Contained	Permit	Citation
Compliance	Means of Determining	Towns & Conditions Contained	INC/MARCOS HOOK	23-00012 - BRASNEM AMER INCIMANCOS FICON

[25 P;	UNLC		4. 2.1. 4.		(Standar in gas/va in light li service.)	Performar New Stati Sources § 60.482-7]	UNLC [40 C Stance		
[25 Pa. Code	UNLOADING RACK		8 8 9	4 0	(Standards: Valves in gas/vapor service in light liquid service.)	Performance for New Stationary Sources §40 CFR 60.482-7]	107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of		
	Section D - IV. Recordkeeping Requirements						Section D - III. Monitoring Requirements	Section	T G
	The permittee shall keep the following records:					(a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 CFR §60.485(b) and shall comply with 40 CFR §60.482-7(b) through (e), except as provided in	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	in the Permit	refills & Conditions Contained
tracked in a facility	The amount of materials loaded and unloaded are	(e) Statement of law that impose no compliance obligations and are thus not amenable to certification.	All leaks were repaired within 15 calendar days or placed on delay of repair.	periodic review of scheduled maintenance activities to track any changes to LDAR components.	components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a	of the facility LDAR Program. Through periodic review and evaluation any	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	Compliance Status	Means of Determining
□Intermittent	⊠Continuous			0			⊠Continuous ☐Intermittent	with Terms & Conditions was:	Compliance

	(h) Statement of law that impose no compliance obligations and are thus not amenable to certification during this compliance review period.			52
	Facility has work practices and procedures in place, including marked-up P&IDs showing equipment in VOC service, as well as equipment not in VOC service.			
	of the facility LDAR Program	(2) The permittee may comply with the recordkeeping requirements for the sources in one record		(Recordkeeping requirements.)
i	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part	(a)(1) The permittee shall comply with the recordkeeping requirements of 40 CFR §60.486.		Standards of Performance for New Stationary Sources §40 CFR 60.4861
⊠Continuous ☐Intermittent	This condition imposes no additional requirements than those conditions elsewhere in this Section.	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.]	Section D - IV. Recordkeeping Requirements	107 - PROPYLENE UNLOADING RACK [40 CFR Part 60
	tracking spreadsheet. VOC emissions for the 107 source is calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined.	a. Number of loadings and unloadings on a monthly basisb. Amount of loaded and unloaded propane/propylene mixture on a monthly basisc. The emissions from the loading and unloading operations on a monthly basis and 12-month rolling sum.		§127.441] (Operating permit terms and conditions.)
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	Permit	Citation Permit

Citation	EN INCHINANCOS FICON			. rayers
Citation	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
107 - PROPYLENE UNLCADING RACK	Section D - IV. Recordkeeping Requirements	[Additional authority of this permit is also derived from 25 Pa. Code §129.100.]	Braskem America, Inc. has chosen to comply with the	⊠Continuous
[40 CFR Part 60 Standards of			car seal option. A monthly car seal inspection	□Intermittent
Ferformance for New Stationary		As per 40 CFR §60.565(b)(2), the permittee shall keep the following records for vent system containing valves that could	program is in place.	
Sources §40 CFR 60.565]		divert the emission stream away from the flare:	ta .	77
(Reporting and			129	
recordkeeping requirements.)		(I) All periods when flow is indicated if flow i	=	
UNLOADING RACK	Section D - V. Reporting	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(e) and 25 Pa. Code §129.71.]	Facility submitted semiannual reports as	⊠Continuous
[40 CFR Part 60 Standards of			required by this condition	□Intermittent
Performance for New Stationary		(a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 CFR	requirement and imposes	
Sources §40 CFR 60.487]		§60.486:	during the current period.	
(Reporting requirements.)		(1) Process unit identification.	performance tests conducted during the	
			compliance review period.	
Sul		(2) For each month duri		i.
107 - PROPYLENE UNLOADING RACK	Section D - V. Reporting	The permittee shall submit to DEP semiannual reports of all periods recorded under 40 CFR §60.565(b) when the vent	Braskem has submitted the applicable information	⊠Continuous
[40 CFR Part 60 Standards of		stream has been diverted from the flare.	in the semi-annual reports. No vent streams were diverted from the flare in	☐Intermittent
New Stationary			this reporting period.	

1	SO SOLO PROCESS AMEDINO MADOLIO LOOK			
Citation	Permit	Terms & Conditions Contained	Means of Determining	Compliance
E E	Section	in the Permit	Compliance Status	with Terms & Conditions was:
Sources §40 CFR 60.565]				
(Reporting and				
recordkeeping requirements.)				
107 - PROPYLENE UNLOADING RACK	Section D - VI. Work Practice Standards	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Facility has work practices and procedures in place, including VOC monitoring	⊠Continuous ☐Intermittent
[40 CFR Part 60			reports maintained as part	20
Performance for		(a) The permittee shall demonstrate compliance with the requirements of 40 CFR §§60.482-1 through 60.482-10 or	Program.	
Sources §40 CFR		§60.480(e) for all equipment.	(c) Statement of law that imposes no compliance	
(Standards:			amenable to certification.	
General.)		(b) Compliance With 40 CFR 9800.402-1 to	Additionally, the facility	l.
			for a determination of	
			equivalency during the current compliance period.	
107 - PROPYLENE	Section D - VI. Work	[Additional authority for this permit condition is also derived from	Except as reported and	Continuous
UNLOADING RACK	Practice Standards	40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	submitted in Sunoco's compliance certification or	⊠Intermittent
[40 CFR Part 60			previous semi-annual	
Standards of		(a) Closed year systems and control devices must comply with	deviation reports, the	
Performance for New Stationary		the respective provisions specified in 40 CFR § 60.482-10.	Sunoco flare is operated and maintained in	* * * * * * * * * * * * * * * * * * * *
Sources §40 CFR			compliance with 40 CFR	20
60.482-10]			60.18. According to	
(Standards: Closed		(b) As per 40 CFR §60.482-10(f), except as provided in 40 CFR	Sunoco Logistics, the sample result of the flare	2 14
vent systems and		2	gas was less than 300	

in the Permit in the		and procedures in place,			95
in the Permit Compliance Status Compliance Status Compliance Status Compliance Status BTU/scf on one occasion on 9/1/2017. The closed vent system is part of the facility. LDAR Program. Inspections under the facility is mechanical integrity program were conducted during this compliance review period. The closed vent system is confinuous operations when emissions may be vented through it. Except for compressors that have no decatable emissions and compressors that have no decatable emissions and compressors are either fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 CFR §60.482-1(c), and compressors are either fluid system that prevents leakage of VOC to the atmosphere or are vented to a control device. (f) Statement of law that impose no compliance obligations and are thus not amenable to certification	2	Facility has work practices			
in the Permit Compliance Status		(f) Statement of law that impose no compliance obligations and are thus not amenable to certification			
in the Permit Compliance Status BTU/scf on one occasion on 9/1/2017. The closed vent system is part of the facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it. [Authority for this permit condition is derived from 40 CFR § 60.482-10; and compressors that have no detectable emissions and are subject to 40 CFR § 60.482-3(i), all remaining compressors are either		fluid system that prevents leakage of VOC to the atmosphere or are vented to a control device.	and 40 CFR §60.482-3(h), (i), and ((Compressors.)
in the Permit Compliance Status BTU/scf on one occasion on 9/1/2017. The closed vent system is part of the facility LDAR Program. Inspections under the facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it. Except for compressors which are controlled by 40 CFR § 60.482-10; and compressors that have no		detectable emissions and are subject to 40 CFR 60.482-3(i), all remaining compressors are either	(a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC		Performance for New Stationary Sources §40 CFR 60.482-3]
in the Permit Compliance Status BTU/scf on one occasion on 9/1/2017. The closed vent system is part of the facility LDAR Program. Inspections under the facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it.	⊠Continuous □Intermittent	Except for compressors which are controlled by 40 CFR § 60.482-10; and compressors that have no	[Authority for this permit condition is derived from 40 CFR §60.562-2(a).]	Section D - VI. Work Practice Standards	UNLOADING RACK [40 CFR Part 60 Standards of
in the Permit Compliance Status		BTU/scf on one occasion on 9/1/2017. The closed vent system is part of the facility LDAR Program. Inspections under the facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it.			control devices.)
Means of Determining	with Terms & Conditions was:	Compliance Status	in the Permit	Section	
	Compliance	Means of Determining	Terms & Conditions Contained	Permit	Citation

	any sampling systems based on this condition	(b) E		(Standards: Sampling connection
2	The closed purge system is designed to capture and transport the purged fluid to a control device. The facility did not exempt	(a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR §60.482-1(c) and 40 CFR §60.482-5(c).		Standards of Performance for New Stationary Sources §40 CFR -60.482-5]
⊠Continuous □Intermittent	Sampling connection systems are equipped with a closed purge system. □In	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - VI. Work Practice Standards	107 - PROPYLENE UNLOADING RACK
	placed on delay of repair.			(Standards: Pressure relief devices in gas/vapor service.)
e a	All leaks were repaired within 5 calendar days or	table less than	8	New Stationary Sources §40 CFR 60.482-4]
	ility LDAR	(a) Except during pressure releases, each pressure relief device		[40 CFR Part 60 Standards of
⊠Continuous □Intermitterit	7 🛭	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Section D - VI. Work Practice Standards	107 - PROPYLENE UNLOADING RACK
	The facility did not exempt any compressors based on this condition during the compliance review period.			
	including VOC monitoring reports maintained as part of the facility LDAR Program.			
with Terms & Conditions was:	Compliance Status wit	in the Permit	Section	¥
Compliance	Means of Determining Co	Terms & Conditions Contained	Permit	Citation
			23-00012 - BRASKEM AMER INC/MARCUS HOOK	23-00012 - BRASKEM AME

8				connectors.)
e a	40			devices in light liquid
	2000			pressure relief
				and valves in heavy
	placed on delay of repair.	T T	5-27	(Standards: Pumps
	All leaks were repaired	neavy liquid service, pressure relief devices in light		Sources §40 CFR 60.482-8]
	Program.	olfactory, or any other detection method at pumps and valves in		New Stationary
	of the facility LDAR	(a) If evidence of a potential leak is found by visual audible	R	Performance for
□Intermittent	including VOC monitoring			[40 CFR Part 60
⊠Continuous	Facility has work practices and procedures in place,	[Additional authority for this permit condition is also derived from 40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Practice Standards	UNLOADING RACK
				107 - DRODVI ENE
	::	(2		ended valves or lines.)
TO .				(Standards: Open-
3	¥	(e).		60.482-6]
	Program.	cap, blind flange, plug, or a second valve, except as provided in 40 CFR \$60,482-1(c) and 40 CFR \$60,482 and (c)		New Stationary Sources \$40 CFR
	of the facility LDAR	(a)(1) Each open-ended valve or line shall be equipped with a	5.500 4.50	Performance for
Intermittent	reports maintained as part			[40 CFR Part 60 Standards of
⊠Continuous	and procedures in place,	40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Practice Standards	UNLOADING RACK
	ימימי שליים מיים מיים מיים מיים מיים מיים מיים		Section D - VI. Work	107 - PROPYLENE
	during the compliance			systems.)
with Terms & Conditions was:	Compliance Status	in the Permit	Caction	
Compliance	means of Determining		0	8
Compliant	Means of Determining	Terms & Conditions Contained	Permit	Citation

	Facility has chosen not to	60.482-10.		Sources §40 CFR
¥	instituted at startup.	(a) As per 40 CFR §60.562-2(a), the permittee shall comply with the requirements specified in 40 CFR §§60.482-1 through		Performance for
	LDAR program was			Standards of
□Intermittent	no specific requirements	25 Fd. Code § 127.512(ii).]	Requirements	UNLOADING RACK
⊠Continuous	This is a historical requirement and imposes	[Additional authority for this permit condition is also derived from	Section D - VII.	107 - PROPYLENE
59	repair during this compliance review period.			9
	Facility has not chosen to			10
	certification			repair.)
	not amenable to			(Standards: Delay of
	impose no compliance			60.482-9]
	(b) Statement of law that	infeasible without a process unit shutdown. Repair of this e		Sources §40 CFR
	Program.	detected will be allowed if repair within 15 days is technically		Performance for
(*) d), d),	of the facility LDAR	(1) Dolow of repoir of equipment for which leaks have been		Standards of
	reports maintained as part			[40 CFR Part 60
□Intermittent	and procedures in place, including VOC monitoring	40 CFR §60.562-2(a) and 25 Pa. Code §129.71.]	Additional Requirements	UNLOADING RACK
⊠Continuous	Facility has work practices	[Additional authority for this permit condition is also derived from	Section D - VII.	107 - PROPYLENE
				(Operating permit terms and conditions.)
				§127.441]
	obligations and is thus not amenable to certification.	refinery grade propylene.	Requirements	DE DE COMP
Commission	imposes no compliance	This source consists of a loading rack, storages, and transfer lines for purchased polymer grade propylene and purchased	Section D - VII. Additional	107 - PROPYLENE
Continuous	Ototomost of low that			
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Complance	Means of Determining	Terms & Conditions Contained	Permit	Citation Permit

Citation	tation Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms &
60.562-2]			current compliance period.	
(Standards: Equipment leaks of VOC.)		(b) As per 40 CFR §60.562-2(d), the permittee shall comply with the pro	Facility has chosen not to apply for a determination of equivalency during the current compliance period.	
			The facility adheres to LDAR work practice for recordkeeping and reporting consistent with 40 CFR 60.486 and 60.487.	
108 FIRE WATER PUMP ENGINES [25 Pa. Code §123.21]	Section D - I. Restrictions - Emission Restriction(s)	No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.	Statement of law not amenable to certification.	⊠Continuous □Intermittent
(General)			ài	
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]	Section D - I. Restrictions - Operating Hours Restriction(s)	The permittee must operate the emergency stationary RICE according to the requirements specified below as per 40 CFR §63.6640(f).	The facility tracks operating hours of each engine to confirm the uses are within guidelines.	⊠Continuous □Intermittent
(How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other				

23_00012 - BRASKEM AMER INC/MARCUS HOOK	B INC/MARCUS HOOK			
Citation	Permit	Terms & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
requirements?)				
108 - FIRE WATER PUMP ENGINES	Section D - III. Monitoring Requirements	The permittee shall monitor and record the operating hours each time the engines are operated.	The facility tracks operating hours of each engine to confirm the uses	☐ Intermittent
[25 Pa. Code §127.441]			are within guidelines.	
(Operating permit terms and conditions.)				
108 - FIRE WATER PUMP ENGINES	Section D - III. Monitoring Requirements	The permittee must install a non-resettable hour meter.	Facility performs routine checks on engines and records operating hours.	⊠Continuous ☐Intermittent
[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]	e.		50	
(What are my monitoring,			8	
installation, operation, and maintenance requirements?)				~
108 - FIRE WATER PUMP ENGINES	Section D - IV. Recordkeeping Requirements	The permittee shall keep the following records each time the engines are operated:	The facility tracks operating hours of each engine to confirm the uses	⊠Continuous ☐Intermittent
[25 Pa. Code §127.441]		(a) The date	are within guidelines.	
(Operating permit terms and		(b) The reason(s) the engine was operated	Till the state of	8
conditions.)		(c) Hours operated		

		Herms & Conditione Contained		H
			Weans of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
Ä	Section D - IV.	[Additional authority of this permit condition is also derived from	The facility documents any	Continuous
	Recordkeeping Requirements	25 Pa. Code §129.100.]	maintenance performed to	⊠Continuous
[40 CFR Part 63	o de la companya de l		ensure the engines are	□Intermittent
NESHAPS for			following manufacturer's	
Source Categories		The permittee must keep records of the maintenance conducted	recommendations.	
840 CFK 63.6655]		on the stationary RICE in order to demonstrate that the		
(What records must I		owner's maintenance plan.		
IRE WATER	Section D - IV			
	Recordkeeping Requirements	for expeditious review according to §63.10(b)(1).	The facility maintains necessary operating and	⊠Continuous
[40 CFR Part 63			maintenance records.	□Intermittent
Source Categories	=======================================	(b) As specified in §63.10(b)(1), you must keep each record for		
§40 CFR 63.6660]		5 years following the date of each occurrence, measurement,	2	
(In what form and		ייים, פטויסטויים מטוטון, ופטטוני, טו ופטטומ.		3
how long must I				
keep my records?)		(c) You		
108 - FIRE WATER S	Section D - VI. Work Practice Standards	The permittee shall maintenane and operate the source in accordance with manufacturers specifications.	The facility maintains	⊠Continuous
[25 Pa. Code			specifications. Routine	□Intermittent
§129.97]			preventative maintenance	
(Presumptive RACT			facility's maintenance	
requirements, RACT emission limitations			tracking system.	
and petition for				
alternative				
compliance schedule.)				

	operating hours and a	provide to the extent practicable for the maintenance and		[40 CFR Part 63
☐Intermittent	established tracking		Section D - VI. Work Practice Standards	108 - FIRE WATER PUMP ENGINES
Opport	The facility is a second			complying with this subpart?)
		Determination of w		(What are my general
	system to confirm that preventative maintenance is performed.	engines in a manner consistent with safety and good air pollution control practices for minimizing emissions.		Source Categories §40 CFR 63.6605]
	operating hours and a maintenance scheduling	(b) At all times the permittee must exerct and maintain the		[40 CFR Part 63 NESHAPS for
□Intermittent	established tracking spreadsheets to document	in this subpart that apply to you at all times.	Practice Standards	PUMP ENGINES
	The facility uses	(a) The permittee must be in compliance with the requirements	Section D - VI Work	400 FIDE WATER
	FI .			operate an existing stationary RICE located at an area source of HAP emissions?)
				limitations, and other requirements must I meet if I own or
		(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes firs		(What emission iimitations, operating
	system.	(a) Change oil and filter every 500 hours of operation or annually, whichever comes first;		NESHAPS for Source Categories §40 CFR 63.6603]
□Intermittent	maintenance is scheduled through the facility's maintenance tracking	specified in Item 4 of Table 2d to 40 CFR 63 Subpart ZZZZ:	Practice Standards	PUMP ENGINES [40 CFR Part 63
⊠Continuous	Routine preventative	The permittee must comply with the following requirements as	Section D - VI. Work	108 - FIRE WATER
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compliance	Means of Determining	Terms & Conditions Contained	Citation Permit	Citation

Citation	tion Permit	Tarme & Conditions Contained		
			Means of Determining	Compliance
ä	Section	in the Permit	Compliance Status	with Terms & Conditions was:
NESHAPS for Source Categories §40 CFR 63.6625]		operation of the engine in a manner consistent with good air poll	maintenance scheduling system to confirm that preventative maintenance	
(What are my monitoring, installation, operation, and maintenance requirements?)			is performed.	
108 - FIRE WATER PUMP ENGINES	Section D - VI. Work Practice Standards	The permittee must demonstrate continuous compliance with the requirements in Item 4 of Table 2d to 40 CFR 63 Subpart	The facility uses	⊠Continuous
[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]		ZZZZ according to the following methods as specified in item 9 of Table 6 to 40 CFR 63 Subpart ZZZZ.	spreadsheets to document operating hours and a maintenance scheduling system to confirm that	□Intermittent
demonstrate continuous compliance with the emission limitations, operating limitations, and other		(a) Operating and maintaining the stationary RICE according to the manufacturer	preventative maintenance is performed.	
108 - FIRE WATER PUMP ENGINES	Section D - VII. Additional	The permittee must comply with the applicable requirements of 40 CFR 63 Subpart ZZZZ no later than May 3, 2013.	The facility uses established tracking	⊠Continuous
[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6595]	vedanenis		spreadsheets to document operating hours and a maintenance scheduling system to confirm that	□Intermittent
(When do I have to			is performed.	

⊠ Continuous	and procedures in place in		Section D - V. Reporting	C02 - FLARE SYSTEM (STEAM-
		(2) At least 90% of each quarter's data shall be available at all		9
	ÿ.	(c) the calculations of the net heating value and the exit velocity, on a three (3) hour rolling average		(Operating permit terms and conditions.)
10	٠	(b) the readings of the exit velocity		§127.441]
in T	and data availability.	(a) the readings of the heat content		[25 Pa. Code
⊠Continuous ☐Intermittent	Facility records are maintained for the net heating value, exit velocity, and data availability.	(1) The permittee shall maintain daily records of :	Section D - IV. Recordkeeping Requirements	C02 - FLARE SYSTEM (STEAM- ASSISTED)
		(b) monitor continuously the velocity of the gas		
			,	
		(a) monitor continuously the heat content of the flare gas using a gas chromatography (GC) analyzer or Department approved device		
	68			conditions.)
		The permittee shall		(Operating permit
	a dedicated flare flow meter.			[25 Pa. Code §127.441]
	gas analyzer. Flare exit velocity is measured using	25 Pa. Code § 127.512(h).]	Requirements	ASSISTED)
Intermittent	BTU value using a flare	The state of the second st	Monitoring	SYSTEM (STEAM-
⊠Continuous	The facility measures flare		Section D - III.	CO2 - FLARE
fi T				subpart?)
				comply with this
Conditions was:	Compliance Status	in the Permit	Section	
7 Tomas 9	Migalia of Descriming	lerms & Conditions Contained	Permit	Citation
Compliance	Means of Determining	Torms & Conditions Contained	R INC/MARCUS HOOK	23-00012 - BRASKEM AMER INC/MARCUS HOOK

Citation	fation Dormit	4		
	CILIT	lerins & Conditions Contained	Means of Determining	Compliance
	Section	in the Permit	Compliance Status	with Terms & Conditions was:
ASSISTED) [25 Pa. Code §127.441]	Requirements	[Additional authority for this permit condition is also derived fom 25 Pa. Code § 127.512(h).]	accordance with applicable regulatory requirements and as specified by individual	□Intermittent
(Operating permit terms and conditions.)		(a) The permitee shall notify the Department within two hours during normal working hours of any malfunction of the flare which is expected to last longer than two hours.	terms and conditions of this Permit. These practices include a process for review and	
		(b) The permittee shall submit	reported via routine "odor and visible emission inspections" and the facility's total event	
C02 - FLARE SYSTEM (STEAM- ASSISTED)	Section D - VI. Work Practice Standards	The flare shall be operated with no emissions of malodorous air contaminants detectable beyond the plant's property in conformance with 25 Pa. Code Section 123.31	To prevent the detection of malodors outside of the property, the facility has	⊠Continuous ☐Intermittent
[25 Pa. Code §127.441]			work practices in place, in accordance with applicable regulatory	
(Operating permit terms and conditions.)			requirements and as specified by individual permit terms and	
			conditions below. These practices include a	
			process for review and correction of deviations	
			reported via routine "odor and visible emission	
33 37			total event reporting process, and the	
			Detection and Repair	į.

		The flare system is for the control of Volatile Organic Compound (VOC) emissions from Plant 1 and Plant 2 manufacturing sources, except the typical atmospheric venting - PSV lifts, etc.		(Operating permit terms and conditions.)
8	certification.			[25 Pa. Code §127.441]
Intermittent	impose no compliance obligations and are thus not amenable to	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]	Additional Requirements	SYSTEM (STEAM- ASSISTED)
	Statement of law that		Section D - VII.	CO2 - FLARE
		(b) calibrate the GC analyzer and the gas flow meter, according to		9
9		(a) operate and maintain all devices according to manufacturer's specifications and/or good operating practices.		conditions.)
	monthly basis.			(Operating permit
	engineering practices. Calibrations of this	The permittee shall		[25 Pa. Code §127.441]
	accordance with good			70000-107
□Intermittent	place to maintain the flare analyzer and flow meter in	25 Pa. Code §129.97(c)(6).]	Section D - VI. Work Practice Standards	SYSTEM (STEAM- ASSISTED)
⊠Continuous	Eacility has system in	realitional authority of this posmit condition is also derived from		1
	program. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices.			
with Terms & Conditions was:	Compliance Status	in the Permit	Section	
Compilance	Means of Determining	Terms & Conditions Contained	Permit	Citation
Compliance	Moon of Determining		R INC/MARCUS HOOK	23-00012 - BRASKEM AMER INC/MARCUS HOOK